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April 16, 2021

VIA E-MAIL

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U.S. Environmental Protection Agency, Region 2
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Zolyamar Luna
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U.S. Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
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Guaynabo, Puerto Rico 00968-8069
luna.zolyamar@epa.gov

**RE: Response to Request for Information Pursuant to Section 104(e) of the
Comprehensive Environmental Response, Compensation and Liability Act,
42 U.S.C. 9604(e), PROTECO Site, Peñuelas, Puerto Rico**

Dear Ms. Leshak and Ms. Luna:

On behalf of The Procter & Gamble Company ("P&G"), I am submitting the following initial response to the Request for Information Pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") for the PROTECO site in Peñuelas, Puerto Rico (the "Site") transmitted to P&G on January 19, 2021 (the "104(e) Request"). Pursuant to correspondence with Ms. Leshak on February 8, 2021, March 10, 2021, March 25, 2021 and April 14, 2021, P&G's initial response is due to the United States Environmental Protection Agency ("EPA") on April 16, 2021.

As previously discussed, representatives of P&G have spent several months gathering information, interviewing current and former employees and reviewing documents for responsiveness to the 104(e) Request. P&G has undertaken a diligent and thorough inquiry into its record for responsive information and documents, and submits this initial response to demonstrate P&G's efforts to date in that regard. Please find P&G's initial response to the 104(e) Request

April 16, 2021

Page 2

annexed hereto as Exhibit A. P&G will supplement this submission with additional responsive information and documents as the same become available.

Do not hesitate to contact me with any questions or concerns regarding this matter.

Very truly yours,

/s/ Leslie G. Wolfe

Leslie G. Wolfe

Enclosures

cc: T. Andrew Eckstein, The Procter & Gamble Company

EXHIBIT A

GENERAL OBJECTIONS

1. P&G objects to the 104(e) Request and each individual request on the basis that they are overbroad and seek information beyond the scope of EPA's authority under CERCLA, 42 U.S.C. §9604(e). Specifically, Section 104(e)(1) of CERCLA, 42 U.S.C. §9604(e)(1), provides that the "authority of this subsection may be exercised only for the purposes of determining the need for response, or choosing or taking any response action under this subchapter, or otherwise enforcing the provisions of this subchapter." P&G objects to the 104(e) Request and each individual request to the extent they seek information or documentation that is not directly related to EPA's efforts to determine the need for a response action or the specifics of any such response action with respect to the Site.
2. P&G objects to the 104(e) Request and each individual request to the extent that they seek information that is not relevant to the purposes outlined in EPA's January 19, 2021 letter enclosing the 104(e) Request.
3. P&G objects to the 104(e) Request and each individual request to the extent that they seek information that is privileged, including, but not limited to, information and documents protected by the attorney-client privilege and attorney work product doctrine.
4. P&G objects to the 104(e) Request and each individual request to the extent that the terms used therein are broader or otherwise inconsistent with how those terms are defined in CERCLA, 42 U.S.C. §9601.
5. P&G objects to the 104(e) Request and each individual request on the basis that EPA did not provide sufficient time for P&G to review available documentation and prepare a response to each request, many of which are broad and require review of voluminous records in order to adequately respond.
6. P&G objects to the 104(e) Request and each individual request to the extent that they seek information regarding P&G's business operations and waste disposal practices before and after the relevant time period in which the Site operated. P&G's responses below are limited to the period from 1975 to 1999 unless otherwise indicated in the specific response.
7. P&G reserves the right to supplement or amend the responses contained herein, including these objections, as additional information and documents become available.

RESPONSE TO REQUEST FOR INFORMATION

1. Answer the following questions regarding the Company:

- a. State the correct legal name and mailing address for the Company;

RESPONSE:

**The Procter & Gamble Company
One Procter & Gamble Plaza
Cincinnati, Ohio 45202**

- b. State the name(s) and address(es) of the President, Chief Executive Officer, and the Chairman of the Board (or other presiding officer) of the Company; and

RESPONSE:

**David Taylor, Chairman of the Board, President and CEO
One Procter & Gamble Plaza
Cincinnati, Ohio 45202**

- c. Identify the state/commonwealth and date of incorporation of the Company and the name of its agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different.

RESPONSE:

State of incorporation: Ohio

Date of incorporation: May 5, 1905

Agent for service of process: CT Corporation System
4400 Easton Commons Way, Suite 125
Columbus, OH 43219

**Agent for service of process (PR): The Company is not registered in
Puerto Rico and has no agent there.**

2. State the corporate history of Vicks, Inc., Olay Company, Inc., and/or Olay, LLC, including all name changes and mergers. List all names under which Vicks, Inc., Olay Company, Inc., and/or Olay, LLC have operated and have been incorporated. For each other name identified, provide the following information:

RESPONSE:

February 4, 1932 – Olay Company, Inc. was incorporated in Delaware. *See* Certificate of Merger with attached Agreement and Plan of Reorganization and Merger, dated Jun. 27, 1986 (“Merger Agreement”).

May 15, 1972 – Vicks, Inc. was incorporated in Delaware. *See* Merger Agreement.

Feb. 5, 1986 - Olay Inc. of Delaware was incorporated in Delaware. *See* Merger Agreement.

Jun. 27, 1986 – Vicks, Inc. and Olay Company, Inc. merged into Olay Inc. of Delaware which then changed its name to Olay Company, Inc. *See* Merger Agreement. Richardson-Vicks Inc. (“RVI”) was the sole shareholder of Olay Inc. of Delaware as well as Vicks Inc. and Olay Company, Inc. RVI had been acquired by The Procter & Gamble Company in November 1985 via merger.

April 4, 2007 - Olay LLC was incorporated in Puerto Rico (Reg. 607) as a wholly-owned subsidiary of Procter & Gamble International Operations SA, which is a wholly-owned subsidiary of The Procter & Gamble Company. *See* Olay LLC Certificate of Organization, Commonwealth of Puerto Rico Department of State (Apr. 4, 2007); Data Sheet Report for Olay, LLC (11/01/20).

Jul. 1, 2007 - Olay Company, Inc. transferred all of its Puerto Rico assets to Olay LLC. *See* Contribution Agreement and Plan of Reorganization, effective July 1, 2007.

Dec. 20, 2007 – Olay Company, Inc. dissolved.

Olay LLC is currently an active limited liability company (federal tax ID 66-0693870) registered in the Commonwealth of Puerto Rico. It is owned 100% by Procter & Gamble International Operations S.A., which is a wholly-owned subsidiary of The Procter & Gamble Company.

- a. Whether that other company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;

RESPONSE:

See above.

- b. Names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and

RESPONSE:

Olay LLC's business address is:
Road 735, Km. 2.3, Barrio Rio Llano
Cayey, PR 00736

Olay LLC's registered agent address is:
361 San Francisco Street Penthouse
San Juan, PR 00901

Olay LLC's officers are:

Christopher Heiert	President
Jon R. Moeller	Vice President-Finance
Valarie L. Sheppard	Vice President-Treasurer
Marc S. Pritchard	Vice President
Laura Becker	Vice President
Victor Aguilar	Vice President
Ana Elena Marziano	Vice President
M. Tracey Grabowski	Vice President
Tadd A. Fowler	Vice President and Assistant Treasurer
Sandra T. Lane	Vice President and Secretary
Valerie L. Obermeyer	Assistant Secretary
Susan Whaley	Vice President and Assistant Secretary
Thomas A. Adams	Assistant Secretary
Jay A. Krebs	Assistant Secretary
Philip Long	Assistant Secretary
Rebecca Stadelmann	Assistant Secretary
Kimberly S. Hanlon	Assistant Secretary
Tapan Buch	Assistant Treasurer
Mayra Melendez	Assistant Treasurer

See Data Sheet Report for Olay, LLC (11/01/20).

- c. Names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of that other company.

RESPONSE:

Olay LLC is currently an active limited liability company (federal tax ID 66-0693870) registered in the Commonwealth of Puerto Rico. It is owned 100% by Procter & Gamble International Operations S.A., which is a wholly-owned subsidiary of The Procter & Gamble Company. It has no subsidiaries.

3. Identify all changes in ownership relating to Vicks, Inc., Olay Company, Inc., and/or Olay, LLC from their dates of incorporation to the present, including the date of any ownership change. If any owner was/is a corporation, identify if the corporation was a subsidiary or division of another corporation. In your identification of any corporation, it is requested that you provide the full corporate name, the state/commonwealth of incorporation, and all fictitious names used/held by that corporation.

RESPONSE:

See Response to Question #2.

4. For each owner that is a subsidiary of another corporation identified in your answer to Request #3, above, please provide a chart that details the corporate structure from that other company through all intermediary entities to the ultimate corporate parent. For purposes of this information request, the term “ultimate corporate parent” means the corporate entity that, while owning or controlling the majority of the shares of common stock in a subsidiary corporation, is not primarily owned/controlled by another corporation.

RESPONSE:

See Response to Question #2.

5. Provide copies of Vicks, Inc., Olay Company, Inc., and/or Olay, LLC’s authority to do business in Puerto Rico. Include all authorizations, withdrawals, suspensions, and reinstatements.

RESPONSE:

Of these entities, only Olay LLC still exists. See attached Certificate of Good Standing for Olay LLC issued by the Government of Puerto Rico on February 12, 2021.

6. State the dates during which Vicks, Inc., Olay Company, Inc., and/or Olay, LLC owned, operated, or leased any portion of the Facility, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including but not limited to purchase and sale agreements, deeds, leases, etc.

RESPONSE:

See Response to Question #2. Further responding, Olay Company, Inc. became the deed owner of the property in 1983 prior to the acquisition of RVI by The Procter & Gamble Company. On July 1, 2007, Olay Company, Inc. transferred its Puerto Rico assets (including the Facility) to Olay LLC.

Upon information and belief, Building C was built in 1997 and expanded in 2010. In 2014 the over the counter (OTC) drug products portion of the operations were transferred to another P&G Plant. Buildings D and E were built around 1985 by the PR Industrial Development Company and were subsequently acquired by P&G. Building D was used for Warehouse and Offices operations; Warehouse has been relocated to another part of the site and a small portion of the area was being used as a maintenance shop and spare part storage when the Facility closed in 2016.

Starting in 2016, after transfer of manufacturing out of Puerto Rico and closure of the Cayey plant, Olay LLC began selling the real estate to third parties. Olay LLC no longer has any ownership interest in the real estate or Facility.

7. Describe the current and past business relationship between the Company and Vicks, Inc.

RESPONSE:

See Response to Question #2. There is no current business relationship.

8. Describe the current and past business relationship between the Company and Olay Company, Inc.

RESPONSE:

See Response to Question #2. There is no current business relationship.

9. Describe the current and past business relationship between the Company and Olay, LLC.

RESPONSE:

See Response to Question #2. The Company is the ultimate parent of Olay LLC.

10. Describe any asset purchase agreements whereby some or all of the assets of Vicks, Inc., Olay Company, Inc., and/or Olay, LLC were sold to any other entity, including the date(s), the companies involved, and the terms of such asset purchase agreement(s).

RESPONSE:

The only such asset purchase agreements identified are described in the Response to Question #2.

11. Indicate whether the Company is the successor to any liabilities, including those under CERCLA, of Vicks, Inc.

RESPONSE:

As described above in the Response to Question #2, the successor to Vicks, Inc. liabilities relating to the Puerto Rico business is Olay LLC.

12. Indicate whether the Company is the successor to any liabilities, including those under CERCLA, of Olay Company, Inc.

RESPONSE:

As described above in the Response to Question #2, the successor to Olay Company, Inc. liabilities relating to the Puerto Rico business is Olay LLC.

13. Indicate whether the Company is the successor to any liabilities, including those under CERCLA, of Olay, LLC.

RESPONSE:

As described above in the Response to Question #2, the legal entity Olay LLC still exists and currently owns the liabilities. Company is the ultimate parent of Olay LLC.

14. Describe how Vicks, Inc. and/or Olay Company, Inc. came to possess the hazardous substances that came to be located at the Site.

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. P&G objects further on the basis that this Request is not authorized by law, is not limited to the time period during which hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at the Site, and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e).

Subject to the foregoing objections and P&G's General Objections, and based on a reasonable investigation, P&G states as follows:

There is little evidence that Vicks, Inc. or Olay Company, Inc. possessed more than a negligible volume of hazardous substances that came to be located at the Site.

The former Vicks, Inc. facility located in Cayay, P.R. was engaged in the manufacturing of cosmetics and health care products from its construction in 1974

until its closure in 2016. Review of available documentation demonstrates that the only waste from the Facility ever connected with the Site was related to washout water from Sinex nasal spray manufacturing processes. As will be discussed below, the liquid waste consisted of 99% water with only traces of mercury (0.22 mg/liter) and total solids (0.17% mg/liter).

Importantly, P&G was not among the PRPs that received EPA's Special Notice Letter and draft waste-in list in 2019. Further, the handwritten waste inventory/ledger prepared by the Site operator during the RCRA period, which EPA provided to the parties on the draft waste-in list, does not list Vicks, Inc. or Olay Company, Inc. as a customer of the Site. The majority of Site waste records provided by USEPA make no mention or reference at all to Vicks, Inc. or Olay Company, Inc. waste, which underscores the very limited interaction the Facility had with the Site.

The few waste records that do mention Vicks, Inc. or Olay Company, Inc. reflect that 33,000 gallons of liquid waste from Sinex nasal spray manufacturing processes were sent to the Site in 1979. The "Table of Waste and Disposal (1979)" found on page 38 of the May 1980 Preliminary Environmental Impact Statement for the Site, *i.e.*, "Declaracion de Impacto Ambiental Preliminar Para Un Vertedero Industrial Operado Por Servacios Carbareon, Inc." (hereinafter "1980 EIS"), indicates that drums containing Sinex aerosol nasal spray residue were sent to the Site from the Vicks Facility for disposal via evaporation in 1979. When the 1980 EIS was issued in May 1980, the landfill was under a Cease and Desist Order issued by the Environmental Quality Board Superfund PA/SI Program (hereinafter "EQB"). (See 1980 EIS at pp. 4 and 56). It is not known when the Cease and Desist Order was lifted, and P&G has not seen any waste records indicating additional loads of liquid waste were sent to the Site in 1980 or any time thereafter.¹

The only other potential nexus document P&G has seen is the Servicios Carbareón, Inc. Waste Characterization Sheet dated July 7, 1981 (Attachment A to EPA's notice letter to Olay, LLC dated Aug. 13, 2020). This however, is not a record of waste that was actually sent to the Site. Rather, it is a forward-looking document provided by customer which enabled the Site operator "to determine how to transport, treat, store and dispose of your waste."

To the extent that additional shipments of Sinex manufacturing process water were sent to the Site after 1979, the shipments would have ceased within 2-3 years. The Facility generated this liquid waste only for a limited period of time (until 1982) as it installed additional onsite treatment capability to treat the water. After it began treating the water, it appears that the Facility sent an unknown amount of spent charcoal cartridges from its detoxification plant to the Site. The cartridges contained only trace levels of mercury, were not changed often and were sent to the

¹ P&G's enclosed document production includes an English translation of pages 1-70 of the EIS.

Site only once a year. Due to the extremely small quantity of mercury sulfide-containing solid accumulated on a monthly basis, EPA reclassified the Facility as a small quantity generator under RCRA. In the early to mid 1990s, Thimerasol was removed from the Sinex formulation. The Company has no information indicating that any of the Facility's waste streams generated by the Facility contained mercury after the removal of Thimerasol in the early to mid 1990s.

In the course of P&G's search for additional information and documents, it has not located any agreements, waste-in records, journals, notes, logs, manifests, ledgers or other records describing actual shipments of waste that were sent to the Site by the Facility. The only potential nexus document P&G has located is a Preliminary Assessment of the Facility prepared by the EQB, dated December 13, 1990 (hereinafter the "1990 PA"). The 1990 PA includes 35 attachments or "References" (hereinafter "Ref."). A true and accurate copy of the 1990 PA and all References are being produced.² Aside from the Site nexus documents provided by EPA, all of the Company's current knowledge regarding communications, dealings or transactions between Vicks, Inc. and/or Olay Company, Inc. and the Site from 1975 to 1999 comes from the 1990 PA.

As described throughout the 1990 PA, including References 21, 24, 27, 31 and 34, the Facility manufactured Sinex nasal spray which contained Thimerasol as a preservative. Thimerasol is a mercuric salicylate used as antiseptic and germicide. According to an October 2, 1979 letter from Servicios Carbareón to the EQB, the concentration of Thiomersal in Sinex was 0.001%. (Ref. 29.) After a manufacturing run of Sinex nasal spray was completed, the equipment and lines were sanitized. The water resulting from this cleaning contained traces of the product. The waste was described as a liquid mixture containing HG Salicylate, classified as toxic under EPA Hazardous Waste No. D009. The liquid mixture was tested and characterized as consisting of 99% water with only traces of HG Salicylate (0.22 mg/liter) and total solids (0.17% mg/liter). Although the waste water was initially classified as hazardous, in 1984 EPA approved the Facility's request to reclassify it as a small quantity generator due to the low concentration of mercury in the waste. (Ref. 21, 23, 24, 26, 27, and 32.)

Records dating from 1979 to 1982 indicate that Vicks, Inc., the Site operator, EPA and the Environmental Quality Board discussed the possible disposal of this waste liquid at the Site, but these records do not confirm that regular shipments of the waste liquid were, in fact, sent to the Site. (Ref. 29, 31.) In August 1979, Servicios Carbareón proposed to store the Sinex waste water in evaporation basins to decrease the water volume to a minimum, and then dispose the residual solid waste in a field cultivation system along with other waste material, including waste from petroleum, fish, activated carbon, oils, etc. (Ref. 29.) There was discussion of an

² P&G's enclosed document production include a complete copy of the 1990 PA as well as English translations of References 17, 20, 28-30 and 34.

initial generation of 5,500 gallons, containing 0.22 mg/l or 0.22 ppm. This was equivalent to 4.58 grams of mercury. After that, a maximum of 3,000 gallons of liquid was expected to be generated per month. In such case, 29.89 grams of mercury would be disposed of annually. (Ref. 29.)

By the early 1980s, the Facility was operating an on-site pretreatment facility to pretreat, detoxify, and pass the Sinex wash water through the Facility's waste water treatment plant and then discharge it to the sewer system. (Ref. 32.) It used a carbon bed system to absorb the mercury from the wash waters. (Ref. 21.) The carbon filters which contained trace amounts of mercury were collected in 55-gallon drums and stored at the Facility. According to the report of an EQB inspection of the Facility in October 1984, the drums of carbon filters were sent to Servicios Carbareón "to be immobilized with kiln dust." (Ref. 24.) A 1986 document stated that the charcoal cartridges were changed every year and sent to Servicios Carbareón for disposal. (Ref. 21.) Aside from what is found in the 1990 PA, the Company has not located any other information regarding the carbon filters.

Based on the above, the time period during which the Facility may have sent Sinex wash water to the Site was only 3-4 years – 1979 to 1981 or 1982 – only a fraction of the time that the Site was in active operations. Aside from the Sinex wash waters and a small quantity of carbon filters, the Company is not aware of any other substances being sent to the Site at any time.

15. List all hazardous substances used, generated, treated, stored, disposed of, manufactured, recycled, recovered, treated, or otherwise processed during Vicks, Inc. and/or Olay Company, Inc.'s operations at the Facility.

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. P&G objects further on the basis that this Request is not authorized by law, is not limited to the time period during which hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at the Site, and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e).

Subject to the foregoing objections and P&G's General Objections, and based on a reasonable investigation, see Response to Question #14. Further responding, P&G states as follows:

The 1990 PA indicates that, in addition to the waste water and charcoal cartridges discussed in the Response to Question #14, the substances used, generated, treated, stored, disposed of, manufactured, recycled, recovered, treated, or otherwise processed during Vicks, Inc. and/or Olay Company, Inc.'s operations at the Facility at various times during the period from 1975 to 1999 included the following:

- solvents used in limited quantities as reagents in lab analyses performed in the QC lab) (Ref. 27.)
- Hydro Chloric Acid and Sodium Hydroxide Solution for ancillary or other use. (Ref. 22.)
- solvents and inks (Ref. 20.)
- kerosene, diesel fuel #2, fuel oil #5, sulfuric acid, & turpentine (Ref. 18.)
- 1,1,1-trichloroethane, methanol and isopropanol used as raw materials and wastes ink, charcoal filters and spent solvents (1990 PA, Site Summary and Recommendations.)
- “mineral oil, waxes, perfumes, coconut oil, isopropyl myristate” used in the production of cosmetics, and “calcium carbonate, carboxypolymethylene, Mannitol, Castor Oil, Aminophylline, Zinc, Mg, tartaric acid, doxylamine succinate, polyvinylpyrrolidone, dibasic phosphate, dibasic dihydrate, quinine sulfite, etc.” used in the production of drugs (Ref. 30.)

The Company is aware of no record or information stating or even suggesting that any of the additional substances listed above were ever sent to the Site.

16. List and fully describe all waste streams generated from Vicks, Inc. and/or Olay Company, Inc.’s operations, including solid, liquid, or any other type of waste.

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. P&G objects further on the basis that this Request is not authorized by law, is not limited to the time period during which hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at the Site, and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e).

Subject to the foregoing objections and P&G’s General Objections, and based on a reasonable investigation, P&G states as follows:

The Facility generated only small amounts of waste, primarily solvents from the QC laboratory. It also generated ink and waste waters from the Sinex manufacturing process. The Sinex waste waters were pre-treated with charcoal filters to remove traces of mercury compounds present on the preservative known as Thimerosal.

Further responding, see 1990 PA and Responses to Questions #14 and #15.

17. Describe in detail the handling, storage, and disposal practices employed by Vicks, Inc. and/or Olay Company, Inc. for each waste stream resulting from its operations.

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. P&G objects further on the basis that this Request is not authorized by law, is not limited to the time period during which hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at the Site, and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e). Subject to the foregoing objections and P&G's General Objections, and based on a reasonable investigation, P&G states as follows:

P&G has no information regarding the handling, storage, and disposal practices employed by Vicks, Inc. and/or Olay Company, Inc. for each waste stream resulting from its operations during the time period from 1975 to 1999 other than what is contained in the 1990 PA, which includes the following:

In 1981 or 1982, a 20' x 40' Flammable Storage Cage (FSC) / RCRA waste unit was constructed. It is unknown where wastes were stored prior to that time. The wastes stored in the FSC were all liquids except for the charcoal filters containing mercury traces from the treatment of Sinex waste waters. By 1986, there was no storage area for hazardous waste because the Facility no longer generated hazardous waste except the charcoal cartridges that may contain traces of mercury salts. (*See Ref. 21, EQB memo dated Mar. 6, 1986.*)

A Waste Water Treatment Plant started operations in 1975. It was designed to process effluent consisting of sanitary waste equipment wash-down and miscellaneous (kitchen/cafeteria, deionizer backwash regeneration, QC laboratory effluent). In 1982, the Facility began designing a pre-treatment system to detoxify the process waste waters prior to treating them in the Waste Water Treatment Plant. It consisted of "a tank to collect the wastewaters, addition of sodium hydroxide to increase the PH of the liquor, mechanical agitation to obtain appropriate mixing, a filter to remove the solids from chemical reactions of the chemicals in the waste under alkaline conditions (including mercury sulfide), a carbon bed system to absorb the remaining mercury from the liquor, a pumping device to recirculate the liquor through the filter and carbon beds, and to transfer it to the Vicks Inc. water treatment facilities." (Ref. 32.) The detoxification system was designed to handle the wastewaters accumulated in one week. Each batch of a week's wastewaters was slowly added at a rate of 1.0 gallon per minute to the detox/treatment facilities. In 1982, Vicks was sending 30,000 gal/day to the POTW. Each weekly batch of detoxified nasal spray waste water was about 500 gallons. (*Id. See also Ref. 21 and 24.*)

Further responding, see Responses to Questions #14 and #15.

18. Identify all individuals who had responsibility for Vicks, Inc. and/or Olay Company, Inc.'s environmental and waste management decisions between 1975 and 1999 (e.g., responsibility for decisions regarding the disposal, treatment, storage, recycling, or sale of Vicks, Inc. and/or Olay Company, Inc.'s hazardous substances, hazardous wastes, and industrial wastes).

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. P&G objects further on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e).

Subject to the foregoing objections and P&G's General Objections, and based on a reasonable investigation, P&G states as follows:

After P&G acquired RVI, in general, the Plant Manager was ultimately responsible for plant decisions, including environmental and waste management decisions. The Plant Manager typically relies on HSE staff at the site to help make decisions about environmental and waste management decisions. The HSE staff at a site can vary, some sites will have an HSE Program Leader, an Environmental Leader and sometimes others. Finally, the site engineer (often referred to as the Technical Systems Manager) will often oversee the site HSE staff and thus might have had some input in these decisions. At the Facility, regional or corporate HSE personnel at times participated in making such decisions along with plant personnel.

P&G has identified the following individuals who held the position of Plant Manager at the Facility at various times between 1975 and 1999:

Name:	Joseph Olozaga
Time period:	Pre-1985 (believe to have preceded Holland)
Name:	Mark Holland
Time period:	Pre-1997 to approx. 1999 or 2000

In addition to the above, P&G has identified the following individuals who may have had a role in making decisions about environmental and waste management decisions at the Facility between 1975 and 1999:

Name:	Angel Chacon
Started at Facility:	1997
Left Facility:	2011/2012
Positions held:	Held several HSE positions from 2005 to 2011/2012. The last position was HSE Leader.
Direct reports:	Teddy Diaz, Environmental Leader (2004-2006/2007) Jose Andujar, Environmental Leader (replaced Diaz)
Current position:	Engineering Director in Oral Care, P&G, Mason, Ohio (Nov. 2020 to present)
Nature of information the person may possess:	Handling and disposal procedures for hazardous and non-hazardous waste
Name:	Richard Torrellas
Started at Facility:	1990
Left Facility:	2004
Positions held:	HSE leader 1996-2004
Direct reports:	unknown
Current position:	Former employee
Nature of information the person may possess:	Handling and disposal procedures for hazardous and non-hazardous waste
Name:	William Carrion
Started at Facility:	unknown
Left Facility:	unknown
Positions held:	Various positions from 1989 to 1990, including environmental engineer and environmental manager (see Ref. 17, 20 and 22)
Direct reports:	unknown
Current position:	Former employee
Nature of information the person may possess:	Handling and disposal procedures for hazardous and non-hazardous waste

- a. Provide each such individual's job title, duties, dates performing those duties, supervisors for those duties, current position, and if applicable the date of the individual's resignation or termination.

RESPONSE:

See above.

- b. Provide the nature of the information possessed by each such individual concerning Vicks, Inc. and/or Olay Company, Inc.'s waste management.

RESPONSE:

See above.

19. For each type of hazardous substance, hazardous waste, and industrial waste used or generated by Vicks, Inc. and/or Olay Company, Inc., describe the agreements or other arrangements for its disposal, treatment, storage, recycling, or sale.
- a. Provide any agreement and document, including waste logs, journals, manifests, or notes, related to any transfer of hazardous substances, hazardous wastes, and industrial wastes from the Facility that came to be located at the Site.
 - b. Provide all correspondence and written communications between Vicks, Inc. and each owner/operator of the Site regarding hazardous substances, hazardous wastes, and industrial wastes that came to be located at the Site.
 - c. Provide all correspondence and written communications between Olay Company, Inc. and each owner/operator of the Site regarding hazardous substances, hazardous wastes, and industrial wastes that came to be located at the Site.

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. P&G objects further on the basis that this Request is not authorized by law, is not limited to the time period during which hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at the Site, and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e).

Subject to the foregoing objections and P&G's General Objections, and based on a reasonable investigation, P&G states as follows:

After a reasonable search, P&G has not located any documents reflecting agreements or arrangements for the disposal, treatment, storage, recycling or sale of any hazardous substances or wastes used or generated by the Facility for the period from 1975 to 1999 other than those included in the 1990 PA which refer to charcoal filters containing trace amounts of mercury that were sent to the Site from the Facility. Richard Torrellas (HSE Leader 1996-2004) recalled that waste was sent to a landfill operated by Browning-Ferris, and then later by another operator. He recalled trucks with green labels.

20. Provide agreements and documents related to the following, including waste logs, journals, manifests, or notes, as set forth below:

- a. The locations where Vicks, Inc. and/or Olay Company, Inc. sent each type of hazardous substance, hazardous waste, and industrial waste for disposal, treatment, or recycling;
- b. List all Waste Transporters used by Vicks, Inc. and/or Olay Company, Inc.;
- c. For each type of hazardous substance, hazardous waste, and industrial waste, specify which Waste Transporter picked it up;
- d. For each type of hazardous substance, hazardous waste, and industrial waste, state how frequently each Waste Transporter picked up such waste;
- e. For each type of hazardous substance, hazardous waste, and industrial waste, provide the volume picked up by each Waste Transporter (per week, month, or year);
- f. For each type of hazardous substance, hazardous waste, and industrial waste, identify the dates (beginning & ending) such waste was picked up by each Waste Transporter;
- g. Indicate the ultimate location for each type of hazardous substance, hazardous waste, and industrial waste. Provide all documents indicating the ultimate disposal/recycling/treatment location for each type of hazardous substance, hazardous waste, and industrial waste;
- h. Describe how Vicks, Inc. and/or Olay Company, Inc. managed pickups of each hazardous substance, hazardous waste, and industrial waste including but not limited to:
 - i. The method for inventorying each type of hazardous substance, hazardous waste, and industrial waste;
 - ii. The method for requesting each type of hazardous substance, hazardous waste, and industrial waste to be picked up;
 - iii. The identity of the Waste Transporter employee/agent contacted for pickup of each type of hazardous substance, hazardous waste, and industrial waste; and
 - iv. The amount paid or the rate paid for the pickup of each type of hazardous substance, hazardous waste, and industrial waste;
- i. Identify the individual or organization that selected the location where each of Vicks, Inc. and/or Olay Company, Inc.'s wastes were taken. Describe the basis for and provide any documents supporting the answer to this Request.

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. P&G objects further on the basis that this Request is not authorized by law, is not limited to the time period during which hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at

the Site, and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e).

Subject to the foregoing objections and P&G's General Objections, and based on a reasonable investigation, P&G states as follows:

P&G has not located any information or documents responsive to this Request, including subsections a. through i.

21. If not already provided, specify the dates and circumstances when Vicks, Inc. and/or Olay Company, Inc.'s hazardous substances, hazardous wastes, and/or industrial wastes were sent, brought, or moved to the Site, and identify the names, addresses, and telephone numbers of the person(s) making arrangements for the containers (e.g., 55-gallon drum, dumpster, etc.) holding hazardous substances, hazardous wastes, and/or industrial wastes to be sent, brought, or transported to the Site. Please also provide all documents that support or memorialize the answer to this Request.

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. P&G objects further on the basis that this Request is not authorized by law, is not limited to the time period during which hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at the Site, and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e).

Subject to the foregoing objections and P&G's General Objections, and based on a reasonable investigation, P&G states as follows:

Except as discussed elsewhere in this Response, P&G has not located any information or documents responsive to this Request.

22. Identify, describe, and provide all documents that refer or relate to the following:
- a. The nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all hazardous substances, hazardous wastes, and industrial wastes involved in each arrangement transferring materials from any facility owned or operated by Vicks, Inc. and/or Olay Company, Inc. (including the Facility) to any other facility;
 - b. In general terms, the nature and quantity of the non-hazardous substances involved in each such arrangement for transporting materials;
 - c. The hazardous substances being mixed or combined with other hazardous substances or non-hazardous substances for each such arrangement. Indicate whether such mixing or combining is common in the industry. Indicate

- whether Vicks, Inc. and/or Olay Company, Inc. was ever asked to stop mixing or combining the hazardous substances with the non-hazardous substances;
- d. Other materials other than the hazardous substances that were involved in the transaction;
 - e. The condition of the transferred material containing hazardous substances when it was stored, disposed of, treated, or transported for disposal or treatment;
 - f. The markings on and type, condition, and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal or treatment; and
 - g. All tests, analyses, analytical results, and manifests concerning each hazardous substance, hazardous waste, and industrial waste involved in each transaction. Include information regarding who conducted the test and how the test was conducted (batch sampling, representative sampling, splits, composite, etc.).

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, ambiguous and unduly burdensome. P&G objects further on the basis that this Request is not authorized by law, is not limited to the time period during which hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at the Site, and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e).

Subject to the foregoing objections and P&G's General Objections, and based on a reasonable investigation, P&G states as follows:

Except as discussed elsewhere in this Response, P&G has not located any information or documents responsive to this Request with respect to the Site or any other facility for the time period from 1975 to 1999.

23. Indicate how long Vicks, Inc., Olay Company, Inc., and/or the Company has had a relationship with the owner(s) and/or operator(s) of the Site.

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. P&G objects further on the basis that this Request is not authorized by law, is not limited to the time period during which hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at the Site, and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e).

Subject to the foregoing objections and P&G's General Objections, and based on a reasonable investigation, any relationship between the Site owner(s)/operator(s) and

Vicks, Inc., Olay Company, Inc. and/or the Company started around 1982 or whenever the Facility began generating spent charcoal filters from the detoxification of waste water containing trace amounts of mercury. It is not known how long the relationship continued. The Company has no information indicating that any of the Facility's waste streams generated by the Facility contained mercury after the removal of Thimerasol from the Sinex formulation in the early to mid 1990s.

24. Identify any individuals, including former and current employees, who may be knowledgeable of Vicks, Inc. and/or Olay Company, Inc.'s operations and practices concerning the handling, storage, and disposal of hazardous substances.

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. P&G objects further on the basis that this Request is not authorized by law, is not limited to the time period during which hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at the Site, and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e).

Subject to the foregoing objections and P&G's General Objections, and based on a reasonable investigation, P&G states as follows:

See individuals identified in the Response to Question #18.

Additionally, the following individuals were identified in the 1990 PA as being employees of a Facility entity; it is unknown if these individuals have knowledge responsive to the request.

Name	Title	Company	Reference Date	Reference(s)
Lourdes Rodriguez	Project Mgr	Olay Company, Inc.	12.6.1990	Ref. 16, Ref. 24, Ref. 35
Jim Chezem	ECD Contact	P&G (Cincinnati)	10.8.1991	Ref. 16
Javier Padro		Olay Company, Inc.	10.8.1991	Ref. 16
Remy Arce		Olay Company, Inc.	10.8.1993	Ref. 16
Antonio Rosario		Olay Company, Inc.	10.8.1994	Ref. 16
William Carrion	Plant Engineer	Olay Company, Inc.	8.4.1989	Ref. 16, Ref. 18, Ref. 20, Ref. 22
Carlos R. Santiago	Engineering Manager	Olay Company, Inc.	2.22.1990	Ref. 18

Emilio Escobar	Engineer Manager	Vicks Inc.		Ref. 26, Ref. 27, Ref. 32
Jose Cortes	Engineering Manager	Olay Company, Inc.	3.06.1986	Ref. 21
Juan Folch	Engineering Manager	Vicks, Inc	12.11.1984	Ref. 23
Jose Carrasquillo	Plant Engineer	Vicks Inc.	10.11.1984	Ref. 24
Joseph Olozaga	President and General Mgr	Olay Company, Inc.	10.8.1992	Ref. 16, Ref. 18, Ref. 29, Ref. 31, Ref. 34
Lesbia B. Diaz		Olay Company Inc.		Ref. 22
T. Vinciguerra		Merrell	6.13.84	Ref. 25

25. Please provide all documents, if not already requested above, that support your responses to Requests #1 - #24, above.

RESPONSE:

All documents referenced in these Responses will be produced.

26. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. P&G objects further on the basis that this Request is not authorized by law, is not limited to the time period during which hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at the Site, and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e).

Subject to the foregoing objections and P&G's General Objections, and based on a reasonable investigation, P&G states as follows:

P&G has attempted to identify all existing relevant and responsive documents. The Facility was closed in 2016 and sold to third parties, and many Facility employees did not transfer to other P&G locations and thus ended their employment with P&G during that time. Additionally, the relevant timeframe in question for documents is now decades in the past. All of these factors are believed to contribute

to the inability of P&G to locate additional responsive documents. Except as otherwise identified and produced herein, P&G is unable to determine whether any other responsive document exists or at one time existed. P&G's belief is that such additional potentially responsive documents would have been destroyed over time consistent with corporate document retention policies described below.

- a. The relevant document retention policy between 1975 and 2020;

RESPONSE:

P&G's current records retention policy became effective as of October 12, 2020. *See P&G Records & Information Management Policy and P&G Records & Information Management Program FAQs effective October 12, 2020.* As explained in the current policy, each employee is a "Record Custodian" and is required annually to review and maintain all records according to a schedule generated from the P&G Records Retention Schedule system that the custodian generates each year applicable to their specific work needs. An example record retention schedule has been provided to demonstrate required retention times for various types of records including types that could be relevant to this 104(e) Request. *See 2/5/2021 Schedule.* For example, original records of the type "Hazardous Waste / Dangerous Goods Shipment Records" are required to be retained for 3 years by the Shipping Office and Site HSE custodians, whereas any copies of such records are permitted to be kept for a maximum of 1 year.

P&G's prior records retention policy was effective from October 18, 2017 until the current policy became effective. *See P&G Records & Information Management Policy and P&G Records & Information Management Program FAQs effective October 18, 2017.* Prior versions of the records management policy have been destroyed per the policy. On information and belief, P&G had no formal corporate retention policy prior to 2004.

- b. A description of how the records were destroyed (burned, trashed, etc.) and the approximate date of destruction;

RESPONSE:

Unknown. In general, after 2004, each P&G site would determine based on local availability the specific provisions for site document destruction including shredding and recycling for paper documents.

- c. A description of the type of information that would have been contained in the documents;

RESPONSE:

Except as reported elsewhere in these responses, unknown.

- d. The name, job title, and most current address known by you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents, the person(s) who would have been responsible for the destruction of these documents, and the person(s) who had and/or still may have the originals or copies of these documents; and

RESPONSE:

Except as reported elsewhere in these responses, unknown.

- e. The names and most current address of any person(s) who may possess documents relevant to these requests for information.

RESPONSE:

Except as reported elsewhere in these responses, other names are unknown.

- 27. List and provide a copy of all agreements or contracts, including but not limited to insurance policies and indemnification agreements, held or entered into by the Company or its subsidiaries that could indemnify it against any liability that it may have under CERCLA for releases or threatened releases of hazardous substances at and from the Facility. In response to this Request, please provide not only those insurance policies and agreements that currently are in effect, but also provide those that were in effect during the period(s) when any hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at the Site.

RESPONSE:

After consulting with outside counsel to review potentially available insurance options, the Company has not identified policies that would definitively apply to the understood facts. However, as the facts become clearer, P&G will continue to assess and can provide an update as requested.

- 28. State whether any claim or claims have been made by the Company to any insurance company for any loss or damage related to operation at the Site, and if so, identify each claim by stating the name of the claimant, the name and address of the insurance company, the policy number, the named insured on the policy, the claim number, the date of claim, the amount of claim, the specific loss or damage claimed, the current status of the claim, and the amount, date, and recipient of any payment made on the claim.

RESPONSE:

No claim has been made.

29. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

RESPONSE:

N/A

30. State the name, title, and address of each individual who assisted or was consulted in the preparation of the response to this Request for Information. In addition, state whether each such person has of the information in the answers provided.

RESPONSE:

P&G objects to this Request on the basis that it is vague, overbroad in scope, unduly burdensome, ambiguous, misleading, and indecipherable. P&G objects further on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. 9604(e).

Subject to the foregoing objections and P&G's General Objections, P&G responds as follows:

Name, Title and Address

**T. Andrew Eckstein
Associate General Counsel & Senior Director
Legal-Global Health, Safety & Environmental
The Procter & Gamble Company
One Procter & Gamble Plaza (C9-139B)
Cincinnati, OH 45202**

**Monica Roll
HSE NA GTM/GI Leader
The P&G US Bus. Serv. Co.
Beckett Ridge Tech Center - CETL
8256 Union Centre Blvd
West Chester, OH 45069**

Personal Knowledge

Coordinated search for information and preparation of P&G's responses with the assistance of counsel. Has knowledge of information and documents reflected in these responses.

Has no knowledge

Jason Covarrubias
CETL Site HSE Leader
NA Solid and Hazardous Waste Owner
NA Dangerous Goods Owner
The P&G US Bus. Serv. Co.
Beckett Ridge Tech Center - CETL
8256 Union Centre Blvd
West Chester, OH 45069

Provided documents pertaining to Q15-17 and 19-23 not relevant to timeframe

Kym Gaylo
Global HSE Governance
Two Procter & Gamble Plaza
TE-3; #225
Cincinnati, OH 45202

Provided some documents, not relevant to timeframe

Bryan Turner
Director of Remediation
P&G US Bus. Serv. Co.
1 Procter & Gamble Plaza, C9
Cincinnati, OH 45202

Provided public records related to PROTECO site

Stephen Jarboe
Healthcare Process & Formulation Section Head
The P&G US Business Serv. Co.
Mason Business Center
8700 Mason-Montgomery Rd
Mason, OH 45040

Provided information pertaining to the removal of Thimerasol from the Sinex formula in the early-to-mid 1990s.

Greg McCoy
Senior Archivist
The P&G US Bus. Serv. Co.
Two Procter & Gamble Plaza
TN-2
Cincinnati, Ohio 45202

Corporate archives has no relevant information

Chris Gallagher
Senior Director, Global Risk & Insurance
The P&G US Bus. Serv. Co.
1 P&G Plaza
Cincinnati, Ohio 45202

Provided information for Q27, 28

Randy Moeller
Records & Information Governance Manager
The Procter & Gamble Co.
2 P&G Plaza
TN14, 314
Cincinnati, Ohio 45202

Provided information for Q26

April 16, 2021

Page 27

Eric Detzel
Administrator
Corporate Securities & Employee Benefits Office
The Procter & Gamble Co.
1 P&G Plaza
Cincinnati, Ohio 45202

**Provided corporation information
and documents for Q1-5, 7-13**

Teresa Luttmann
Administrator, HSE Legal Office
The Procter & Gamble Co.
1 P&G Plaza
Cincinnati, Ohio 45202

No relevant information in files

Franklyn Legall
Director of Remediation
The P&G US Bus. Serv. Co.
Boston GO & Tech Center
Bldg 2L-070
One Gillette Park
Boston, MA 02127

Has no knowledge

Karen Sturgeon
Administrator
Global Facilities & Real Estate
Two Procter & Gamble Plaza
TE-3; #225
Cincinnati, OH 45202

**Provided documents pertaining to
real estate, Q6**

Ralph Muoio
Outside Counsel, Insurance
Covington & Burling
One CityCenter
850 Tenth Street, NW
Washington, DC 20001

Provided information for Q27, 28

Edna Brown
Records Manager, P&G Records Management
The P&G US Business Serv. Co.
Mason Business Center
8700 Mason-Montgomery Rd
Mason, OH 45040

No relevant information in files

Mircea Sarghi
Records Manager, Records Lifecycle Mgmt &
E2E Document Mgmt Services
The P&G US Business Serv. Co.
Mason Business Center
8700 Mason-Montgomery Rd
Mason, OH 45040

**Records handled by Edna Brown, no
relevant information in files**

Angel Chacon
Oral Care Engineering Director
The P&G US Business Serv. Co.
Mason Business Center
8700 Mason-Montgomery Rd
Mason, OH 45040

**Held several HSE positions from
2005 to 2011/2012, ending with HSE
Leader. Provided some information
on how the plant handled waste.**

Rhea West
PHC Engineering
The P&G US Business Serv. Co.
Mason Business Center
8700 Mason-Montgomery Rd
Mason, OH 45040

No information

Marcus Richardson
Skin and Pet Care Platform Eng AD
The P&G US Business Serv. Co.
Mason Business Center
8700 Mason-Montgomery Rd
Mason, OH 45040

**Provided some contacts, no
knowledge**

Christopher Hansen
Oral Care Development
The P&G US Business Serv. Co.
Mason Business Center
8700 Mason-Montgomery Rd
Mason, OH 45040

No knowledge

Haixia Liu
TI Director, GBS STC E2E Document
Management Service Global Leader
P&G Tech (Beijing) Co
Beijing Innovation Ctr-Tianzhu
No 35 Yu'an Road
Tianzhu Donggang
Development Zone B, Shunyi District
Beijing 101312 P.R. China

No relevant information in files

**Susana Gomez
Business Planning & Analysis Group Mgr
P&G Intl Operations SA
Parque Empresarial Forum 1
San Jose, Costa Rica**

No relevant information in files

**Bibi Cruz
Consultant for Crux Sites
P&G do Brasil Ltda
Rio De Janeiro Plant
Avenida Dom Heider Camara No. 561
Rio De Janeiro, Brazil**

**2012-2014 HSE Mgr, Cayey Plant.
Does not recall; no information.**

**Rich Archuleta
Grooming P&E Program Mgr.
The Gillette Company LLC
One Gillette Park
Boston, Mass 02127-1096**

**2001-2011 Technical System Mgr
Responsible for HSE last 3 years at
plant. Has no knowledge.**

**Ivette Guzman
Engineering Change Mgmt. Director
The Procter & Gamble Manuf. Co.
Greensboro - Brown Summit Plant
6200 Bryan Park Rd.
Browns Summit, NC 27214**

**Cayey - 2013-2016 Technical
Assistant Mgr. Recalls no hazardous
waste sent to landfills.**

**Juan ("JJ") Flores-Garcia Skin Care Operations
Director
The Procter & Gamble Mfg. Co.
Greensboro - Brown Summit Plant
6200 Bryan Park Rd.
Browns Summit, NC 27214**

**2007-2013 Cayay Process Leader
and Remediation leader. Only recalls
WW Treatment system.**

**Ruth Kuilan
IWS Leader
The Procter & Gamble Mfg. Co.
Greensboro - Brown Summit Plant
6200 Bryan Park Rd.
Browns Summit, NC 27214t**

**Cayey - 2010-2016 Making and
Packing Operations process
engineer. Does not recall; no
information.**

**Jean L. Torres Gonzales
Project Manager
The Procter & Gamble Mfg. Co.
Greensboro - Brown Summit Plant
6200 Bryan Park Rd.
Browns Summit, NC 27214**

**Cayey - 2008-2016 PCIN Mgr, Asst.
Manager. Recalls hazardous waste
was not sent to landfills, handled by
third party, does not recall specifics.**

Veronica Sosa-Colon
Quality Assurance dept. Leader
P&G Hair Care LLC
Iowa City Beauty Care Plant
2200 Lower Muscaine Road
Iowa City, Iowa 52240

Cayey 2012-2015 - Process engineer
in Making Dept. Does not recall; no
information.

Kristin Okhuysen
Fabric Care Manf. Capability Tabler Sr.
Director
The Procter & Gamble Co.,
Tabler Station Plant
396 Development Drive
Inwood, WV 25428

Cayey 2010-2013 - Plant Manager.
Does not recall; no information.

Jennifer Chan
Global F&HC Supply Chain Sustainability
Program Leader
The P&G US Business Services Co
F&HC Innovation Center
5299 Spring Grove Ave
St. Bernard, OH 45217

Has no knowledge.

Christina FabregasRios
Site Quality Manager Phoenix Plant
The Procter & Gamble Mfg. Co.
Phoenix Plant
2050 S. 35th Ave.
Phoenix, AZ 85009

Cayey 2011-2016 Site Quality
Manager. Has no knowledge.

Ursula Brenes
Former North America Payment Services
Customer Service Team Leader
No longer with P&G

Unable to contact.

Marcela Quijano
Former Procurement to Payments Group
Manager
No longer with P&G

Unable to contact.

Richard Torrellas
No longer with P&G

HSE leader 1996-2004. Provided
some information on how the plant
handled waste.

Brian Billings
No longer with P&G

Started at Facility in 19982, retired
in 2008. Knowledge of Sinex
manufacturer but no information
pertaining to waste disposal.

Olay LLC

Status: Active
 Incorporation: Commonwealth of Puerto Rico
 Federal Tax ID #: 66-0693870
 Fiscal Year End: 6/30
 Legal Entity No. 2159

Business Address

Road 735, Km. 2.3, Barrio Rio Llano
 Cayey, PR 00736

Registered Agent Address

361 San Francisco Street Penthouse
 San Juan, PR 00901

OFFICERS

Christopher Heiert	President
Jon R. Moeller	Vice President-Finance
Valarie L. Sheppard	Vice President-Treasurer
Marc S. Pritchard	Vice President
Laura Becker	Vice President
Victor Aguilar	Vice President
Ana Elena Marziano	Vice President
M. Tracey Grabowski	Vice President
Tadd A. Fowler	Vice President and Assistant Treasurer
Sandra T. Lane	Vice President and Secretary
Valerie L. Obermeyer	Assistant Secretary
Susan Whaley	Vice President and Assistant Secretary
Thomas A. Adams	Assistant Secretary
Jay A. Krebs	Assistant Secretary
Philip Long	Assistant Secretary
Rebecca Stadelmann	Assistant Secretary
Kimberly S. Hanlon	Assistant Secretary
Tapan Buch	Assistant Treasurer
Mayra Melendez	Assistant Treasurer

Sole Member

Procter & Gamble International
 Operations S.A.

%Ownership

100%

**Date Issued
 or Transferred**
 04/04/2007

INCORPORATION/QUALIFICATIONS

Jurisdiction	Inc/Qual	Date	Registration No.
Puerto Rico	Organization	04/04/2007	607



Government of Puerto Rico

CERTIFICATE OF GOOD STANDING

I, **Lawrence N. Seilhamer Rodríguez**, **Secretary of State** of the Government of Puerto Rico,

CERTIFY: That, pursuant to Puerto Rico's General Law of Corporations, **OLAY LLC**, register number **607**, a **for profit domestic** Limited Liability Company organized under the laws of Puerto Rico on **April 4, 2007**, has complied with the payment of its Annual Fees.



IN WITNESS WHEREOF, the undersigned by virtue of the authority vested by law, hereby issues this certificate and affixes the Great Seal of the Government of Puerto Rico, in the City of San Juan, Puerto Rico, today, **February 12, 2021**.

A handwritten signature in blue ink, reading "Lawrence N. Seilhamer Rodríguez".

Lawrence N. Seilhamer Rodríguez
Secretary of State

To validate this certificate go to:

<http://estado.pr.gov/>

This certificate is valid for one (1) year from issue date (Regulation 8688, Art. 26). However, it is subject to faithful compliance with the provisions of Chapter XV and Chapter XXI of Act 164-2009, as applicable.

Certificate Validation Number: **383233-30968261**

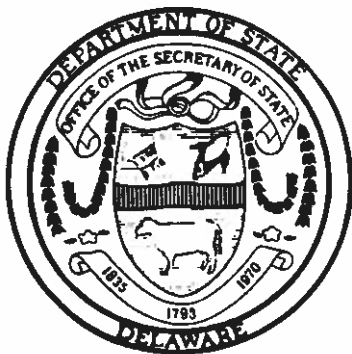
State of Delaware



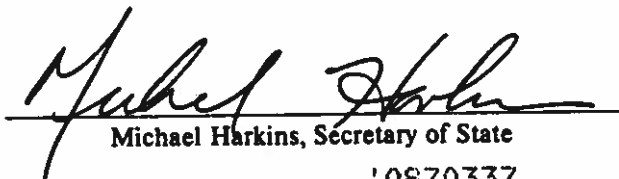
Office of Secretary of State

I, MICHAEL HARKINS, SECRETARY OF STATE OF THE STATE OF DELAWARE DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF MERGER OF "OLAY COMPANY, INC." AND "VICKS INC." AND "VICKS PRODUCTS INC." AND "VICKS VAPORS COMPANY" MERGING WITH AND INTO "OLAY INC. OF DELAWARE" UNDER THE NAME OF "OLAY COMPANY, INC." AS RECEIVED AND FILED IN THIS OFFICE THE THIRTIETH DAY OF JUNE, A.D. 1986, AT 10 O'CLOCK A.M.

| | | | |



726181116


Michael Harkins, Secretary of State
AUTHENTICATION: 10870337
DATE: 06/30/1986

CERTIFICATE OF MERGER

MERGING

OLAY COMPANY, INC.
VICKS INC.
VICKS PRODUCTS INC.
VICKS VAPORS COMPANY

INTO

OLAY INC. OF DELAWARE

* * * * *

The undersigned corporation organized and existing under and
by virtue of the General Corporation Law of the State of Delaware,

DOES HEREBY CERTIFY:

FIRST: That the name and state of incorporation of each
of the constituent corporations of the merger is as follows:

<u>NAME</u>	<u>STATE OF INCORPORATION</u>
Olay Company, Inc.	Delaware
Vicks Inc.	Delaware
Vicks Products Inc.	Delaware
Vicks Vapors Company	Delaware
Olay Inc. of Delaware	Delaware

SECOND: That an Agreement and Plan of Reorganization
and Merger between the parties to the merger has been approved,
adopted, certified, executed and acknowledged by each of the
constituent corporations in accordance with the requirements
of subsection (c) of section 251 of the General Corporation
Law of the State of Delaware.

THIRD: The name of the surviving corporation of the merger is Olay Inc. of Delaware, which shall herewith be changed to Olay Company, Inc.

FOURTH: That the amendment or change in the Certificate of Incorporation of Olay Inc. of Delaware, the surviving corporation, to be effected by the merger is as follows:

"1. The name of the corporation is Olay Company, Inc."

FIFTH: That the executed Agreement and Plan of Reorganization and Merger is on file at the principal place of business of the surviving corporation. The address of the principal place of business of the surviving corporation is Ten Westport Road, Wilton, Connecticut 06897.

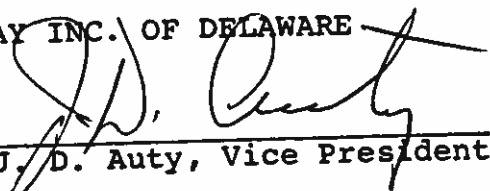
SIXTH: That a copy of the Agreement and Plan of Reorganization and Merger will be furnished by the surviving corporation, on request and without cost to any stockholder of any constituent corporation.

SEVENTH: This Certificate of Merger shall be effective on June 30, 1986.

Dated: June 27, 1986

OLAY INC. OF DELAWARE

By


J. D. Auty, Vice President

ATTEST:


H. O. Cutler, Secretary

AGREEMENT AND
PLAN OF REORGANIZATION AND MERGER

AGREEMENT OF MERGER, dated this 27th day of June, 1986, pursuant to Section 251 of the General Corporation Law of the State of Delaware, between Olay Company, Inc., a Delaware Corporation, Vicks Inc., a Delaware Corporation, Vicks Products Inc., a Delaware Corporation, and Vicks Vapors Company, a Delaware Corporation, (hereinafter collectively referred to as the "Merged Corporations"), and Olay Inc. of Delaware, a Delaware Corporation.

WITNESSETH that:

WHEREAS, Richardson-Vicks Inc. ("RVI") is the sole shareholder of Olay Inc. of Delaware and each of the Merged Corporations and has adopted and approved this Agreement and Plan of Reorganization and Merger; and

WHEREAS, tax counsel has advised that certain Puerto Rican tax advantages not now available to the businesses of the Merged Corporations can be achieved if the operating assets of such corporations are acquired by Olay Inc. of Delaware by merger of the Merged Corporations with and into Olay Inc. of Delaware; and

WHEREAS, the shares of common stock of RVI Acquisition Corp. ("RVIA") owned by Vicks Inc., Olay Company, Inc. and Vicks Vapors Company ("RVIA shares") are not necessary to or used in the businesses of said corporations and are not wanted by Olay Inc. of Delaware; and

WHEREAS, RVI, Vicks Inc., Olay Company, Inc. and Vicks Vapors Company have agreed that the RVIA shares shall be distributed by the said corporations to RVI as described herein; and

WHEREAS, all of the corporations desire to merge into a single corporation, as hereinafter specified; and

WHEREAS, Olay Inc. of Delaware, had its certificate of incorporation filed in the office of the Secretary of State of Delaware, on February 5, 1986, and recorded in the office of the Recorder of Deeds for the County of New Castle on February 5, 1986, and has an authorized capital stock consisting of one thousand five hundred (1,500) shares of common stock without nominal or par value, of which capital stock, one hundred (100) shares of such common stock are now issued and outstanding and such shares shall remain issued and outstanding; and

WHEREAS, said Olay Company, Inc. had its certificate of amendment of certificate of incorporation filed in the office of said Secretary of State on November 1, 1937, and recorded in the office of the Recorder of Deeds for the County of New Castle on November 1, 1937, and has an authorized capital stock consisting of one thousand five hundred (1,500) shares without par value, all of one class, of which capital stock one thousand four hundred eighty-eight (1,488) shares are now issued and outstanding; and said Olay Company, Inc. had its certificate of incorporation filed in the office of said Secretary of State on February 4, 1932, and recorded in the office of the Recorder of

Deeds for the County of New Castle on February 4, 1932, and had an authorized capital stock consisting of one thousand (1,000) shares without par value; and

WHEREAS, said Vicks Inc. had its certificate of amendment of certificate of incorporation filed in the office of said Secretary of State on October 25, 1974, and recorded in the office of the Recorder of Deeds for the County of New Castle on October 25, 1974, and has an authorized captial stock consisting of two thousand (2,000) shares, without par value, all of one class, of which capital stock one thousand one hundred three (1,103) shares are now issued and outstanding; and said Vicks Inc. had its certificate of incorporation filed in the office of said Secretary of State on May 15, 1972, and recorded in the office of the Recorder of Deeds for the County of New Castle on May 15, 1972, and had an authorized capital stock consisting of one thousand (1,000) shares, without par value; and

WHEREAS, said Vicks Products Inc. had its certificate of incorporation filed in the office of said Secretary of State on November 12, 1981, and recorded in the office of the Recorder of Deeds for the County of New Castle on November 12, 1981, and has an authorized capital stock consisting of one thousand (1,000) shares of the par value of One Dollar (\$1.00) each, all of one class, amounting in the aggregate to One Thousand Dollars (\$1,000), of which capital stock one thousand (1,000) shares are now issued and outstanding; and

WHEREAS, said Vicks Vapors Company had its certificate of incorporation filed in the office of said Secretary of State on

October 17, 1983, and recorded in the office of the Recorder of Deeds for the County of New Castle on October 17, 1983, and has an authorized capital stock consisting of one thousand (1,000) shares of the par value of One Dollar (\$1.00) each, all of one class, amounting in the aggregate to One Thousand Dollars (\$1,000), of which capital stock one thousand (1,000) shares are now issued and outstanding; and

WHEREAS, the registered office of said Olay Inc. of Delaware in the State of Delaware is located at 1209 Orange Street in the City of Wilmington, County of New Castle, and the name of its registered agent at such address is The Corporation Trust Company; and the registered office of Olay Company, Inc. in the State of Delaware is located at 1209 Orange Street in the City of Wilmington, County of New Castle, and the name of its registered agent at such address is The Corporation Trust Company; and the registered office of Vicks Inc. in the State of Delaware is located at 1209 Orange Street in the City of Wilmington, County of New Castle, and the name of its registered agent at such address is The Corporation Trust Company; and the registered office of Vicks Products Inc. in the State of Delaware is located at 1209 Orange Street in the City of Wilmington, County of New Castle, and the name of its registered agent at such address is The Corporation Trust Company; and the registered office of Vicks Vapors Company in the State of Delaware is located at 1209 Orange Street in the City of Wilmington, County of New Castle, and the name of its registered agent at such address is The Corporation Trust Company.

WHEREAS, following the merger of the Merged Corporations into Olay Inc. of Delaware, it will change its name to Olay Company, Inc.

NOW, THEREFORE, Olay Inc. of Delaware and the Merged Corporations, in consideration of the business purposes, the mutual covenants, agreements and provisions hereinafter contained do hereby prescribe the terms and conditions of said Agreement and Plan of Reorganization and Merger and mode of carrying the same into effect as follows:

FIRST: Vicks Inc., Olay Company, Inc. and Vicks Vapors Company own 3,440, 11,100 and 1,060 shares respectively, of the RVIA shares (par value \$1.00 per share), which are not necessary to, or used in, the businesses of said corporations. RVI, Vicks Inc., Olay Company, Inc., Vicks Vapors Company and Olay Inc. of Delaware hereby agree that the RVIA shares shall be distributed to RVI pursuant to this Agreement and Plan of Reorganization and Merger prior to the time the merger becomes effective, but subject to the consummation thereof.

SECOND: Olay Inc. of Delaware hereby merges into itself, Olay Company, Inc., Vicks Inc., Vicks Products Inc. and Vicks Vapors Company; and the said Olay Company, Inc., Vicks Inc., Vicks Products Inc. and Vicks Vapors Company shall be and hereby are merged into Olay Inc. of Delaware, which corporation shall be the surviving corporation (hereinafter referred to as "the Surviving Corporation").

THIRD: The certificate of incorporation of Olay Inc. of Delaware is amended as follows:

"1. The name of the corporation is Olay Company, Inc."

FOURTH: Upon the effective date of this merger, (i) each share of common stock of the Merged Corporations shall be cancelled and retired and cease to exist, and no shares of common stock or other securities of the Surviving Corporation shall be issuable with respect thereto, and (ii) the number of authorized, issued and outstanding shares of common stock of the Surviving Corporation shall remain the same.

FIFTH: The terms and conditions of the merger are as follows:

(a) The by-laws of Olay Inc. of Delaware as they shall exist on the effective date of this merger shall be and remain the by-laws of the Surviving Corporation until the same shall be altered, amended or repealed as therein provided.

(b) The directors and officers of the Surviving Corporation shall continue in office until the next annual meeting of stockholders and until their successors shall have been elected and qualified.

(c) This merger shall become effective upon filing with the Secretary of State of Delaware. However, for all accounting purposes the effective date of the merger shall be as the close of business on June 30, 1986.

(d) Upon the merger becoming effective, all the property, rights, privileges, franchises, patents,

trademarks, licenses, registrations and other assets of every kind and description of the Merged Corporations shall be transferred to, vested in and devolve upon the Surviving Corporation without further act or deed and all property, rights, and every other interest of the Surviving Corporation and the Merged Corporations shall be as effectively the property of the Surviving Corporation as they were of the Surviving Corporation and the Merged Corporations respectively. The Merged Corporations hereby agree from time to time, as and when requested by the Surviving Corporation or by its successors or assigns, to execute and deliver or cause to be executed and delivered all such deeds and instruments and to take or cause to be taken such further or other action as the Surviving Corporation may deem necessary or desirable in order to vest in and confirm to the Surviving Corporation title to and possession of any property of the Merged Corporations acquired or to be acquired by reason of or as a result of the merger herein provided for and otherwise to carry out the intent and purposes hereof and the proper officers and directors of the Merged Corporations and the proper officers and directors of the Surviving Corporation are fully authorized in the name of the Merged Corporations or otherwise to take any and all such action.

IN WITNESS WHEREOF, the parties to this agreement, pursuant to the approval and authority duly given by resolutions adopted

by their respective boards of directors and that fact having been certified on said Agreement of Merger by the Secretary or Assistant Secretary of each party thereto, have caused these presents to be executed by the duly authorized officers of the respective corporations and attested by the Secretary or Assistant Secretary of each party hereto as the respective act, deed and agreement of each of said corporations, on this 27th day of June, 1986.

ATTEST:

By Herm. D. Luth

OLAY INC. OF DELAWARE

By J.P. O'Leary

ATTEST:

By Herm. D. Luth

OLAY COMPANY, INC.

By J.P. O'Leary

ATTEST:

By R. Anderson

VICKS INC.

By W. J. Ferguson

ATTEST:

By R. Anderson

VICKS PRODUCTS INC.

By W. J. Ferguson

ATTEST:

By R. Anderson

VICKS VAPORS COMPANY

By W. J. Ferguson

ATTEST:

By Kenneth E. Fishman

RICHARDSON-VICKS INC.

By Richard Blawie


Commonwealth of Puerto Rico
DEPARTMENT OF STATE
San Juan, Puerto Rico

CERTIFICATE OF ORGANIZATION

I, **FERNANDO J. BONILLA**, Secretary of State of the Commonwealth of Puerto Rico;

CERTIFY: That "**OLAY LLC**", registered number **607**, is a Limited Liability Company, organized under the laws of Puerto Rico, since **April 4, 2007** at **1:31 PM**.

IN WITNESS WHEREOF, the undersigned by virtue of the authority vested by law, hereby issues this certificate and affixes the Great Seal of the Commonwealth of Puerto Rico, in the City of San Juan today, **April 4, 2007**.


FERNANDO J. BONILLA
Secretary of State



COMMONWEALTH OF PUERTO RICO
DEPARTMENT OF STATE
SAN JUAN, PUERTO RICO

I, **FERNANDO J. BONILLA**, Secretary of State of the Commonwealth of Puerto Rico,

CERTIFY: That according to our records, "OLAY LLC" register number 607, is a Limited Liability Company organized under the laws of **Puerto Rico**, since April 4, 2007 at 1:31 p.m.

IN WITNESS WHEREOF, the undersigned by virtue of the authority vested by law, hereby issues this certificate and affixes the Great Seal of the Commonwealth of Puerto Rico, in the City of San Juan, today May fifteenth of the year two thousand and seven.

A handwritten signature in black ink, appearing to read "F. J. Bonilla".

FERNANDO J. BONILLA
Secretary of State

FJB/rsr
0426862

Commonwealth of Puerto Rico
DEPARTMENT OF STATE
San Juan, Puerto Rico

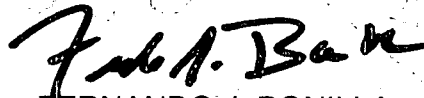
CERTIFICATE OF ORGANIZATION

I, **FERNANDO J. BONILLA**, Secretary of State of the Commonwealth of Puerto Rico;

CERTIFY: That "**OLAY LLC**", register number **607**, is a Limited Liability Company, organized under the laws of Puerto Rico, since **April 4, 2007** at **1:31 PM**.

IN WITNESS WHEREOF, the undersigned by virtue of the authority vested by law, hereby issues this certificate and affixes the Great Seal of the Commonwealth of Puerto Rico, in the City of San Juan, today, April 4, 2007.

COPIA



FERNANDO J. BONILLA
Secretary of State

Commonwealth of Puerto Rico
DEPARTMENT OF STATE
San Juan, Puerto Rico

CERTIFICATE OF ORGANIZATION

I, **FERNANDO J. BONILLA**, Secretary of State of the Commonwealth of Puerto Rico;

CERTIFY: That "**OLAY LLC**", register number **607**, is a Limited Liability Company, organized under the laws of Puerto Rico, since **April 4, 2007 at 1:31 PM**.

Noted

IN WITNESS WHEREOF, the undersigned by virtue of the authority vested by law, hereby issues this certificate and affixes the Great Seal of the Commonwealth of Puerto Rico, in the City of San Juan today, April 4, 2007.

COPIA

Fernando J. Bonilla
FERNANDO J. BONILLA
Secretary of State



ESTADO LIBRE ASOCIADO DE PUERTO RICO
COMMONWEALTH OF PUERTO RICO

DEPARTAMENTO DE ESTADO
DEPARTMENT OF STATE

CERTIFICADO DE ORGANIZACIÓN
CERTIFICATE OF ORGANIZATION

07 APR -2 PM 3:27

CENTRO UNICO
BOZON EXPRESO

PRIMERO: El nombre de la compañía de responsabilidad limitada es _____

FIRST: The name of the limited liability company is OLAY LLC

El nombre deberá identificar el término bajo el cual estará registrada, deberá escoger uno:

The name should have the term by which the company will go to be registered, please choose one:

_____ Compañía de Responsabilidad Limitada o _____ C.R.L.

_____ Limited Liability Company o _____ L.L.C.

o la designación: or the designation:

_____ CRL _____ XX LLC

La compañía de responsabilidad limitada es:

The limited liability company is:

Foránea _____ Foránea no estadounidense _____ Doméstica _____

Foreign _____ Foreign (not from the U.S.) _____ Local XX

SEGUNDO: La dirección física y postal de la oficina principal es (incluya calle, número y municipio)

SECOND: The street and mailing address of the main office of business is (include street, number and municipality)

STREET AND MAILING ADDRESS: ST RD 735, KM. 2.3 PO BOX 7000
RIO LLANO WARD CAYEY, PR 00737
CAYEY, PR 00736

TERCERO: El nombre y la dirección física y postal del agente residente autorizado para recibir emplazamientos en nombre de la compañía de responsabilidad limitada es (incluya calle, número y municipio):

THIRD: The name and street and mailing address of the resident agent authorized to receive service of process on behalf of the limited liability company is (include street, number and municipality)

CT CORPORATION SYSTEM PO BOX 9022946
361 SAN FRANCISCO STREET-PENTHOUSE SAN JUAN, PR 00902-2946
SAN JUAN, PUERTO RICO 00901

CUARTO: El (los) nombre(s) y la(s) dirección(es) física y postal del(los) administrador(es) o miembro(s) es (son) (incluya calle, número y municipio):

FOURTH: The name(s) and street and mailing addresses of the administrator(s) or member(s) are (include street, number and municipality):

OLAY COMPANY, INC.
STREET AND MAILING ADDRESS: ST RD 735, KM. 2.3 PO BOX 7000
RIO LLANO WARD CAYEY, PR 00737
CAYEY, PR 00736

07 APR -4 PM 1:31

Recibido
Unión de Corporaciones

FIFTH: The business that the limited liability company carries out is the following:

SIXTH: The name and street and mailing address of the person authorized to register the Certificate of Organization
Steven Iemison - Street and Mailing Address: One Procter & Gamble Plaza, Cincinnati, Ohio 45202

SEVENTH: *The term of existence of the limited liability company will be (you must choose one):*

Favor de indicar con una "X" la fecha en que la compañía de responsabilidad limitada tendrá vigencia:
Please indicate with an "X" the date on which the limited liability company will be effective:

____ La siguiente fecha (que no excederá de 90 días a partir de la fecha de radicación):
The following date (which will not exceed 90 days from the filing date):

(Día, mes y año/ day, month and year) _____

EN TESTIMONIO DE LO CUAL, Yo (Nosotros), _____, soy (somos) el (los) miembro(s), administrador(es) o persona(s) autorizada(s) de formar una compañía de responsabilidad limitada conforme a la Ley General de Corporaciones de 1995, según enmendada por la Ley Núm. 487 de 23 de septiembre de 2004, declaro (declaramos) bajo pena de perjurio que los datos contenidos en esta solicitud son ciertos, hoy _____ de _____ de 200_____.

IN WITNESS WHEREOF, I (We), STEVEN JEMISON, being the member(s), administrator(s) or authorized person(s), responsible of forming a limited liability company pursuant to the General Corporations Act of Puerto Rico of 1995, as amended by the Public Law 487 of September 23rd, 2004, hereby declare under penalty of perjury that the facts herein stated are true, this 29 day of MARCH, 2007.

Cifra de Ingreso:
R4391: \$37.50
R4392: \$12.50
\$50.00

REFERENCE 17

August 4, 1989

Mr. William Carrión
Environmental Engineer
OLAY COMPANY INC.
Apartado 7000
Cayey, Puerto Rico 00639

SUBJECT: **OLAY COMPANY INC.**
CARR. 735, KM. 2.3
CAYEY, PUERTO RICO
PFE-18-0588-0368-I-II-0

Dear Mr. Carrión,

I am writing to you about your request for approval of the emission source mentioned in the subject.

Following the submission of the required documentation and the relevant assessment, the **CONDITIONED** operation of the abovementioned emission source **IS APPROVED** as far as environmental pollution is concerned, including the terms and conditions submitted in your request, which are part of this approval. This approval shall expire on August 4, 1991 and it may be revoked before then if it is found that the conditions under which it was granted have changed or that the provisions as per the applicable Regulations in force are violated.

Throughout the effective period of this approval, the following shall be complied with:

- 1- The maximum sulfur content in liquid fuel No. 5 to be burnt by the 200 HP steam boiler shall not exceed 2.5 % per weight as per the Order and Resolution issued by this Board on November 25, 1986.
- 2- The maximum consumption of fuel No. 5 in such boiler shall not exceed 56 gallons per hour as per the information submitted to this Board.
- 3- The submission of duly certified monthly fuel consumption and sulfur content reports shall be maintained as per the abovementioned Resolution and Rule 103 of the Regulations for the Control of Environmental Pollution in force.

4- Should you desire, in the future, to make changes to such conditions or to the emission equipment included in this permit, you must request so in writing to this Board for assessment.

The emission sources approved herein are detailed in Annex A, which is part of this approval, including those sources included in the request for approval.

We would like to point out that this Board reserves the right to intervene in the source in connection with other environmental aspects not covered in this approval.

Sincerely,

ENVIRONMENTAL QUALITY BOARD

[Illegible signature]

Carlos R. Vázquez Ayala
Associate Member

[Illegible signature]

Pedro A. Maldonado Ojeda
Vice President

[Illegible signature]

Santos Rohena Betancourt
President

AI-IL-msa

ANNEX A

EMISSION SOURCES INCLUDED IN THIS APPROVAL

SOURCE	CONTROL EQUIPMENT	CHARACTERISTICS
I. Tablets Area		
a. Two steelyards [Handwritten: OK]	One No. 202 gas scrubber with capacity for 2,400 cfm and an estimated 95 % efficiency	Used for weighing raw material
b. Fluid Bed Dryer [Handwritten: OK]	A 4,237 cfm bag-type dust collection system	Used for drying tablets
c. Tyloxapol mixer [Handwritten: OK]	-----	It uses 120 Kg/week of Tyloxapol
d. Ten mixing tanks [Handwritten: OK]	-----	Used for mixing waters, mineral oil and PF wax. There is a vent to which all tanks are connected. 8,500 gallons are mixed per week.
II. Creams Area		
a. One ozonizer [Handwritten: OK]	One tank with catalytic conversion	Produces 2 #/day of ozone
III. Inhalers Area		
a. Inhaler production unit [Handwritten: OK]	A ventilation system for organic compounds with a 300 cfm capacity	Its emission of organic compounds is estimated at 1.56 g/min.
b. Vaporub filling line [Handwritten: OK]	A 300 cfm ventilation system	Uses adhesives to seal the boxes.

OLAY COMPANY INC.
PFE-18-0588-0368-I-II-0

IV. Utilities Area

- | | | |
|--|-------|---|
| a. Two Cleaver & Brooks
boilers (each with 50
HP)
[Handwritten: OK] | ----- | Each boiler consumes 15
gal/h of kerosene |
| b. Two firefighting
pumps
[Handwritten: OK] | ----- | Each pump has a 215 HP
motor with a diesel
consumption of 10 gal/h. |
| c. Power generation unit | ----- | It has a 1490 HP motor
with a diesel consumption
of 35 gal/h. |

OLAY COMPANY INC.
PFE-18-0588-0368-I-II-0

ANNEX B

EMISSION SOURCES WITH SUPPLIED HEAT CAPACITY EXCEEDING 8 MM BTU/H

SOURCE NAME	Stack No.	CAPACITY	Stack coord X	'(Km) Y	Allowable %S	Coordinating Parameters	
						Stack Height	Exit Temp (F)
One (1) 20 [illegible] HP Cleaver Brooks boiler [Hand- written: OK]	1 [Hand- written: OK]	8.26 MM BTU/HR	1'03.41	32.72	2.5	42	500 °F

REFERENCE 20

FREE ASSOCIATED STATE OF PUERTO RICO / OFFICE OF THE GOVERNOR

[Logo] Environmental Quality Board

October 3, 1989

MEMORANDUM

TO : Flor del Valle López [illegible signature]
Director
Land Pollution Control Division

FROM : Maribel Medina Torres [handwritten: M. M. T]
Junior Environmental Science Specialist

SUBJECT : **Inspection at Olay, Co.**
Cayey, Puerto Rico

Last October 3, 1989, the subject facility was visited to determine whether it met the requirements applicable to small hazardous waste generating facilities. I was received there by Eng. William Carrión, Environmental Manager of the facility. Mr. Carrión showed me the area where hazardous wastes are stored and he provided me with the information below.

The company is in the business of manufacturing cosmetics, haircare and healthcare products. The process generates waste from solvents and inks. From the solvents, 15 gallons of waste are generated every three (3) months, and from the ink, 15 gallons of waste are generated per year.

In the facility, records are kept of: waste tests, evidence of agreements with local authorities, generation of waste and manifests. The summary of the latest manifests is provided below:

<u>Transportation Date</u>	<u>Transported Waste</u>	<u>Transported Quantity</u>
9-8-89	D001, F003, F005, D008	30 gal.

Ensuring the cleanliness you expect in your surrounding environment

Board Office: Calle del Parque Núm. 204 Esq. Pumarada / Postal Address: Apartado 11488, Santurca, P.R. 00910 / Telephone 725-5140

	D001, F002, F003, F005	220 gal.
	D001, F002, F003, F005	30 gal.
6-30-89	D001, F002, F003, F005	55 gal.
	D001, F002, F003,	165 gal.
	Non RCRA Regulated	330 gal.
	D008, F005, F003, D001	15 gal.
3-28-89	D001	55 gal.
3-15-89	Non RCRA Regulated	975 lbs.

The facility has a satellite area in the laboratory. In that area, there was one (1) half-full 15-gallon drum containing organic solvents. This container was identified as hazardous waste.

The area dedicated to hazardous waste storage has the following: watertight base, ditch, material for spillage control, sprinklers, controlled access, fire extinguisher and fire alarm. However, no records of inspections to the area are kept. At the moment of inspection, there was no waste accumulated in the area.

The facility has an emergency coordinator. Moreover, the exposed personnel receive training on personal protection and hazardous waste handling.

The inspection findings show that the facility meets almost all the requirements applicable to small generating facilities. However, it is exempted from such requirements since it generates less than 100 Kg/month of such waste.

Recommended Action:

A letter is to be sent to the facility notifying the results from the inspection.

/chd

FREE ASSOCIATED STATE OF PUERTO RICO / OFFICE OF THE GOVERNOR

[Logo] Environmental Quality Board

December 13, 1989

Eng. William Carrión
Environmental Manager
Olay Company
Box V
Cayey, Puerto Rico 633

Dear Mr. Carrión,

Last October 3, 1989, Olay Company's premises in Cayey were visited by personnel appointed by the Small Waste Generating Facilities Program to determine whether they met the requirements of such Program. During the inspection, it was found that the facility generates less than 100 Kg/month of hazardous waste. For that reason, it is exempted from such requirements.

As a generating facility exempted from the requirements, the abovementioned generation limit may not be exceeded and no more than 1,000 Kg of hazardous may be accumulated in it, otherwise it shall have to meet all the requirements applicable to small generating facilities.

Sincerely,

[illegible signature]

Flor del Valle López

Manager

Land Pollution Control Division

MM/chd

[Illegible]

CONTRIBUTION AGREEMENT AND PLAN OF REORGANIZATION

THIS CONTRIBUTION AGREEMENT AND PLAN OF REORGANIZATION (the "Contribution Agreement"), effective as of July 1, 2007, is made by and between Olay Company, Inc., a Delaware corporation ("Transferor") and Olay LLC, a Puerto Rico limited liability company ("Transferee").

1. Contribution of Assets. As a voluntary addition to paid in capital, Transferor hereby contributes, conveys, assigns, transfers and delivers to Transferee all of Transferor's right, title and interest in and to the assets, properties, rights, claims, contracts and businesses of Transferor's Puerto Rico branch office (the "Branch Office"), whether tangible or intangible, real, personal or mixed, accrued, contingent or otherwise, and wherever located, as listed on Schedule 1, which include the real properties located in the Commonwealth of Puerto Rico described in Schedule 2 (collectively, the "Assets"), free and clear of all liens, claims, charges, pledges, security interests, options and other legal or equitable encumbrances.

2. Assumption of Liabilities. Transferee hereby accepts the contribution of the Assets and assumes and undertakes to perform and pay the debts, liabilities and obligations of the Branch Office with respect to the Assets, either existing or incurred prior to the Closing Date or arising out of transactions or events occurring prior to the Closing Date (except all expenses, taxes, debts, liabilities and obligations of Transferor incurred or to be incurred by Transferor in the preparation of this Contribution Agreement and the performance of the terms and conditions of this Contribution Agreement), as set forth on Schedule 3 (collectively, the "Assumed Liabilities").

3. Valuation. The parties hereto acknowledge and agree that the Assets have a fair market value of US\$165,128,591, and the Assumed Liabilities have a fair market value of US\$18,187,526, each as determined by the parties hereto.

4. Closing Date. The contribution and assumption shall be effective on July 1, 2007 (the "Closing Date").

5. Further Assurances. Transferor and Transferee agree that each of them will execute and deliver such further instruments of conveyance, transfer or assumption, including any deed of transfer, and take such other action, including delivery of any required governmental notice, as may be necessary to carry out the purposes and intents of this Contribution Agreement.

6. Tax Treatment. For Puerto Rico income tax purposes, it is intended that this Contribution Agreement shall qualify as a reorganization within the meaning of Section 1112(g)(1)(D) of the Puerto Rico Internal Revenue Code of 1994, as amended.

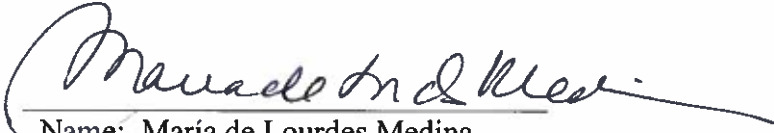
7. Binding Nature. This Contribution Agreement shall be binding upon and inure to the benefit of the parties hereto and the successors and assigns of the parties hereto.

8. Governing Law. This Contribution Agreement shall be governed by and construed in accordance with the laws of the Commonwealth of Puerto Rico.

9. Counterparts. This Contribution Agreement may be executed in one or more counterparts, all of which shall be considered one and the same agreement, and shall become effective when one or more counterparts have been signed by each of the parties and delivered to the other party.

IN WITNESS WHEREOF, the parties hereto have executed this Contribution Agreement as of the date first above written.

OLAY COMPANY, INC.

By: 
Name: Maria de Lourdes Medina
Title: Senior Counsel – Authorized Representative

OLAY LLC

By: 
Name: Graciela Eleta de Cacho
Title: Vice President

SCHEDULE 1

Cash & Cash Equivalents	467,861
Accounts Receivables	50,409,075
Finished Goods Inventory	25,256,523
Manufacturing Contract	26,821,100
Property, Plant, and Equipment	56,729,821
Prepaid Expenses	0
Other Assets	5,444,211
Total Assets	\$165,128,591




SCHEDULE 2

DESCRIPTION OF REALTY

1. Real property located in the Municipality of Cayey, Puerto Rico, identified as property number 14150, recorded at page 84 of volume 385 of Cayey, Registry of Property of Puerto Rico, Caguas Section I, described as follows:

"RÚSTICA: Parcela "A". Parcela de terreno designada Parcela "A" del Bloque Industrial Cayey Este, localizada en el Barrio Rincón del Municipio de Cayey, en lindes por el NORTE, con terrenos de la Corporación de Renovación Urbana y Vivienda, por el SUR, con el Remanente del Lote número trece (#13) del cual se segrega, por el ESTE, con la Carretera de acceso del Parque Industrial conocido como "Vicks Merell Drive" y con terrenos de la Compañía de Fomento Industrial y por el OESTE con el Remanente del Lote número trece (#13) del cual se segrega. Tiene un área de doce punto siete cero cinco punto uno cero dos ocho (12.705.1028) metros cuadrados equivalentes a tres punto dos tres dos (3.232) cuerdas."

2. Real property located in the Municipality of Cayey, Puerto Rico, identified as property number 20,012, recorded at page 183 of volume 479 of the Registry of the Property of Puerto Rico, Cayey Section I, described as follows:



"RÚSTICA: Lot 13-10-12-8 of Cayey Este Industrial Park located in the Rincón Ward of the Municipality of Cayey, Puerto Rico, with a superficial area of 67,217.17 square meters, equivalent to 17.1018 cuerdas, bounded on the NORTH, by land property of the Corporación de Renovación Urbana y Vivienda, previously of Jose R. Izquierdo and by Street A of the same Industrial development, on the SOUTH, by land property of Fernando Emmanuelli on the EAST, by the end of the principal access road to the industrial development and Lot number six (#6) of the aforesaid industrial development and on the WEST by land property of Fernando Emmanuelli. This Parcel of land contains three industrial buildings, or industrial building composed of three units describes as follows: Project number T -1302-80AT Cayey. This a pitched roof type building consisting of reinforced concrete foundations, columns and girders supporting thirty (30) feet long steel joist which in turn support gauge number twenty-two (#22) standard galvanized steel deck covered by one inch (1") fiberglass insulation and three (3) piles built up roofing. Roof ventilators spaces are provided. The structure consists of a main floor 120'8"x90'6", out to out dimensions with an area of 10,920.64 square feet of manufacturing space; one lean-to 30'6"x12'6" for an area of 381.25 square feet, provided for sanitary facilities, entrance porch 16'2"x8'4" for an area of 134.70 square feet. This amounts to a total of 11,436.59 square feet of covered floor space. The floor consists of four-inch (4") thick reinforced concrete slab with a monolithic cement finish. Floor slab designed for a live load of 150 pounds per square foot. Exterior walls are concrete blocks plastered and painted on both sides. Interior walls at the lean-to are plastered and painted together with a 6'1" high sprayed on glazed finish wainscot. Ceiling is rubbed and painted throughout the building. Windows are the Miami Aluminum type throughout the building. Interior doors are made of plywood and exterior are industrial type metal ones. One metal rolling door 10'x10' at loading area. Clearance in the manufacturing area from finished floor to lowest part of beams at the side eaves is twelve feet two and one-quarter inch (12'-2 1/4"). Project T-1302-A-82: This is a pitched roof type building consisting of reinforced concrete foundations columns and girders supporting thirty (30) feet long steel joists which in turn support gauge number twenty-two (#22) standard galvanized steel covered by one (1') foot fiber glass insulations and a three (3) piles built-up-roofing. Roof ventilators are provided. The structure consists of a main floor 180'-00"x90'-06", out to out dimensions with an area of 16,280.00 square feet of manufacturing space, a lean-to number one (#1) 30'06"x12'-06", for an area of 381.25 square feet. This amounts to a total area of 17,057.50 square feet of covered floor space. The floor consists of a four-inch (4") thick reinforced

concrete slab with a monolithic cement finish. Floor slab designed for a live load of 150 pounds per square foot. Exterior walls are of concrete blocks plastered and painted on both sides. Interior walls at the lean-to are plastered and painted together with a 6'-1" high prayed on glazed finish wainscot. Ceiling is rubbed and painted throughout the building. Windows are the Miami Aluminum type throughout the building. Interior doors are made plywood and exterior are industrial type metal ones. One metal rolling door 10'x10' at loading area. Clearance in the manufacturing area from finished floor to lowest part of beams at the side eaves is 12'-1½".

Project T T-1302-2-83: This is a pitched roof type building consisting of reinforced concrete foundations columns and girders supporting thirty (30) feet long steel joist which in turn support gauge number twenty-two (#22) standard galvanized steel decks covered by one inch (1") fiberglass insulation and a three (3) piles built-up-roofing. Roof ventilators spaces are provided. The structure consists of a main floor 210'-04"x90'-00", out to out dimensions with an area of 18,929.70 square feet, another main floor of 270'4"x91'2" out to out dimensions with an area of 24,627.06 square feet for a total area of manufacturing space of 43,556.76 square feet; a lean-to mark number one (#1) for space of 12'6"x60'6" out dimensions with an area of 756.25 square feet, a lean-to mark number two (#2) for space of 12'-6"x 30'-00" out to out dimensions with an area 375.00 square feet. This amounts to a total area of 44,688.01 square feet of covered floor space. The floor consists of four-inch (4") thick reinforced concrete slab with a monolithic cement finish. Floor slab designed for a live load of 150 pounds per square feet. Exterior walls are concrete blocks plastered and painted on both sides. Interior walls at the lean-to are plastered and painted together with 6'-00" high glazed tile. Ceiling is rubbed and painted throughout the building. Windows are Aluminum type, except that in the front walls are glass panel type. Clearance is the manufacturing area from finished floor to lowest part of beams at the side eaves is 12'-2½". Original building is 11,436.59 square feet extension number one (#1) 17,052.50 square feet. Extension number two (#2) 44,688.01 square feet for a total area of 73,177.10 square feet."

SCHEDULE 3

Accrued Liabilities	\$18,187,526
Total Liabilities	\$18,187,526



OLAY COMPANY, INC.

I, Susan S. Felder, DO HEREBY CERTIFY that I am Assistant Secretary of Olay Company, Inc., an Ohio corporation, the Sole Member of Olay LLC (the "Company"), and I DO HEREBY FURTHER CERTIFY that below are true and exact copies of resolutions approved by Olay Company, Inc. in its Written Consent of the Sole Member of Olay LLC dated April 20, 2007 and that said resolutions are still in full force and effect.

WHEREAS, the Member wishes to appoint officers to manage the business and affairs of the Company.

NOW THEREFORE, be it:

RESOLVED, that the following persons be, and each of them hereby is, elected to serve in the offices of the Company set opposite their respective names:

Paolo DeCesare – President
Clayton C. Daley, Jr. - Vice President – Finance
John P. Goodwin - Vice President and Treasurer
Valarie L. Sheppard - Vice President and Comptroller
Graciela C. Eleta – Vice President
Michael D. Kuremsky - Vice President
Luis Campos - Vice President
Dennis W. Shuler - Vice President
Richard A. Hughes - Vice President
John P. Souza – Vice President
Maria de Lourdes Medina – Secretary
E.J. Wunsch - Assistant Secretary
Susan S. Felder - Assistant Secretary
Deborah K. Snellgrove - Assistant Secretary
J. Douglas Gerstle - Assistant Treasurer

RESOLVED FURTHER, that except as hereinafter provided in this Written Consent, checks of the Company shall be signed by the President, a Vice President, the Treasurer or an Assistant Treasurer. The Treasurer or an Assistant Treasurer is authorized to designate to any individual directly or indirectly responsible to the Treasurer or an Assistant Treasurer the authority to sign checks of the Company on bank accounts maintained for specific purposes. In addition, the Treasurer is authorized to delegate the authority to designate to any individual directly or indirectly responsible to the Treasurer the authority to sign checks of the Company on bank accounts maintained for specific purposes.

RESOLVED FURTHER, that checks of the Company drawn against accounts maintained for specific purposes at any bank, wherever located, may be signed with applied facsimile signature of the Treasurer of the Company. In

addition, the Treasurer or the Vice President-Finance is authorized to designate the use of the facsimile signature of an employee of the Company for checks of the Company drawn against accounts maintained for specific purposes. In the use of said facsimile signature, this Company assumes full responsibility for any and all checks bearing forged signatures resulting from such mechanically applied facsimile signature.

RESOLVED FURTHER, that the President, a Vice President, the Treasurer or an Assistant Treasurer are authorized to instruct a Company bank through use of verbal or mechanized communication to transfer funds from a Company account at that bank to the bank account of a payee. In addition, the Treasurer or an Assistant Treasurer of the Company is authorized to delegate to a Company bank or to any individual directly or indirectly responsible to the Treasurer or an Assistant Treasurer the authority to instruct a Company bank to transfer funds from a specific account to specific payees.

RESOLVED FURTHER, that drafts of the Company may be signed by the Treasurer, an Assistant Treasurer, or any employee or agent authorized in writing by the Treasurer or an Assistant Treasurer without the requirement of any other signature.

RESOLVED FURTHER, that documents of guarantee to banks and other outside lenders making loans to enable employees being transferred to purchase new residences in their new locations may be signed by the Vice President-Finance, the Treasurer, or an Assistant Treasurer.

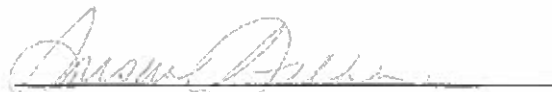
RESOLVED FURTHER, that all officers of the Company shall hold their offices during the pleasure of the Member, and until their successors are elected and qualified. The Member may remove or suspend any officer at any time, without notice.

RESOLVED FURTHER, that the Treasurer shall have charge of the funds of the Company. It shall be the Treasurer's responsibility to determine that proper records are kept showing all receipts and disbursements of the Company. The Treasurer shall also be responsible for the selection of depositories for the funds of the Company, and shall perform such other duties as may be assigned to him or her by the Member or the President. In addition, the Treasurer is authorized to delegate to other employees of the Company the authority to select depositories for the funds of the Company.

RESOLVED FURTHER, that the Assistant Treasurers shall perform such duties as may be assigned to them by the Treasurer or the Member, including the selection of depositories for the funds of the Company. The Member or the President may designate one of the Assistant Treasurers to be acting Treasurer during the absence or disability of the Treasurer.

WITNESS my hand as of this 17th day of May, 2007.

OLAY COMPANY, INC.

A handwritten signature in cursive script, appearing to read "Susan S. Felder", written over a horizontal line.


Susan S. Felder
Assistant Secretary

THE PROCTER & GAMBLE COMPANY

I, Susan S. Felder, DO HEREBY CERTIFY that I am Assistant Secretary of The Procter & Gamble Company, an Ohio corporation, and I DO HEREBY FURTHER CERTIFY as follows:

Olay LLC is a wholly-owned indirect subsidiary of The Procter & Gamble Company of Cincinnati, Ohio, United States of America, with its General Offices located at One Procter & Gamble Plaza, Cincinnati, Ohio 45202.

WITNESS my hand and official seal of The Procter & Gamble Company as of this 17th day of May, 2007.


Susan S. Felder
Assistant Secretary

May 17, 2004
Cincinnati, Ohio

UNITED STATES OF AMERICA)
STATE OF OHIO) ss:
COUNTY OF HAMILTON)

Before me, a Notary Public, in and for the State of Ohio, personally appeared Susan S. Felder, personally known to me to be the person whose name is subscribed to the foregoing instrument and who acknowledged that she executed the same in her authorized capacity and that the same is her free act and deed for the purpose therein expressed.

WITNESS my hand and official seal this 17th day of May 2007.


Notary Public



DONNA D. QUINN
Notary Public, State of Ohio
My Commission Expires 11-16-07

OLAY COMPANY, INC.
A Delaware Corporation

ACTION BY WRITTEN CONSENT OF THE SOLE SHAREHOLDER

IN LIEU OF A MEETING

The undersigned, constituting the sole shareholder of Olay Company, Inc., a Delaware corporation (the "Corporation"), hereby adopt by this Written Consent, dated June 30, 2007 in accordance with Section 228 of the General Corporation Law of the State of Delaware, the following resolutions with the same force and effect as if they had been adopted at a duly convened meeting of shareholders:

NOW THEREFORE BE IT:

RESOLVED, that the form, terms and conditions of the draft Contribution Agreement and Plan of Reorganization between Olay LLC, a Puerto Rico limited liability company (the "LLC"), and the Corporation, including the schedules and exhibits thereto, substantially in the form of the draft thereof attached hereto as Exhibit A (the "Agreement"), be, and hereby are, authorized and approved;

RESOLVED FURTHER, that all of the Corporation's right, title and interest in and to the assets, properties, rights, claims, contracts and businesses of the Corporation's Puerto Rico branch office (the "Branch Office"), whether tangible or intangible, real, personal or mixed, accrued, contingent or otherwise, and wherever located, as listed in the Agreement, including the real properties located in the Commonwealth of Puerto Rico described in Schedule 2 of the attached Agreement (said real estate collectively the "Realty"), shall be contributed conveyed, assigned, transferred and delivered to the LLC according to the terms of the Agreement;

RESOLVED FURTHER, that the Corporation, hereby approves the form, terms and conditions of the proposed draft "Deed of Transfer and Conveyance of Real Properties as Voluntary Additional Capital Contribution" to be executed by and between the Corporation, as transferor, and the LLC, as transferee, to consummate the contribution, assignment, transfer and conveyance to the LLC, as a voluntary addition to paid in capital, of the fee simple ("pleno dominio") title and all of the Corporation's rights, title and interest in the Realty (the "Deed of Conveyance"), in accordance with the terms of the Agreement;

RESOLVED FURTHER, that the Corporation, hereby authorizes and appoints Graciela Eleta, of legal age, married, executive and resident of Guaynabo, Puerto Rico, María de Lourdes Medina, of legal age, married, attorney-at-law and resident of Guaynabo, Puerto Rico, Jason Muncy, of legal age, unmarried, attorney-at-law and resident of Independence, Kentucky, and Eric J. Wunsch of legal age, married, attorney-at-law and resident of Cincinnati, Ohio to act as authorized signatories of the Corporation (the "Authorized Signatories") and to enter into execute, and deliver, on behalf of the Corporation, the Agreement, the Deed of Conveyance, and any and all other documents, public or private, relating to the disposition and cancellation of any existing liens of the Realty, necessary or required in connection therewith, and to take any and all such other actions relating to or in connection with the foregoing documents, as may be necessary to effectuate the purposes of these resolutions, including their recordation in the corresponding section of the Registry of Property of Puerto Rico, under such terms and conditions as said person may approve, such approval to be conclusively evidenced by the execution and delivery of any said documents; and,

RESOLVED FURTHER, that the Authorized Signatories are hereby authorized and directed to do, delegate or cause to be done all such acts and things and to make, execute, and deliver, or cause to be made, executed and delivered, in the name and on behalf of the Corporation such agreements, deeds of transfer, notices to governmental authorities, statements, documents and instruments as may be deemed by any of them necessary or appropriate to fully effectuate the foregoing, and all actions taken in furtherance thereof by any of the Authorized Signatories prior to the date of this Written Consent are hereby ratified and approved in all respects.

IN WITNESS WHEREOF, The Procter & Gamble Company has signed this Action by Written Consent of the Sole Shareholder in Lieu of a Meeting of the Corporation as of the date stated above, in Cincinnati, Ohio.

The Procter & Gamble Company

By: 

Name: John P. Goodwin

Title: Vice President & Treasurer

**WRITTEN CONSENT OF THE SOLE MEMBER
OF OLAY LLC**

Olay Company, Inc. (the "Member"), a Delaware corporation being the sole member of Olay LLC, a limited liability company organized and existing under the laws of the Commonwealth of Puerto Rico (the "Company"), hereby adopts and approves the following resolutions effective June 30, 2007, all in accordance with the Limited Liability Company Agreement of the Company:

NOW THEREFORE BE IT:

RESOLVED, that the form, terms and conditions of the draft Contribution Agreement and Plan of Reorganization between the Member and the Company, including the schedules and exhibits thereto, substantially in the form of the draft thereof attached hereto as Exhibit A (the "Agreement") be, and hereby are, authorized and approved;

RESOLVED FURTHER, that the Member authorizes the Company to accept the contribution of all of the Member's right, title and interest in and to the assets, properties, rights, claims, contracts and businesses of the Member's Puerto Rico branch office (the "Branch Office"), whether tangible or intangible, real, personal or mixed, accrued, contingent or otherwise, and wherever located, as listed in and according to the terms of the Agreement, including the real properties located in the Commonwealth of Puerto Rico described in Schedule 2 of the attached Agreement (said real estate collectively the "Realty");

RESOLVED FURTHER, that the Member authorizes the Company to assume and undertake to perform and pay the debts, liabilities and obligations of the Branch Office according to the terms of the Agreement;

RESOLVED FURTHER, that the Member, hereby approves the form, terms and conditions of the proposed draft "Deed of Transfer and Conveyance of Real Properties as Voluntary Additional Capital Contribution" to be executed by and between the Member, as transferor, and the Company, as transferee, to consummate the contribution, assignment, transfer and conveyance to the Company, as a voluntary addition to paid in capital, of the fee simple ("pleno dominio") title and all of the Member's rights, title and interest in the Realty (the "Deed of Conveyance"), in accordance with the terms of the Agreement;

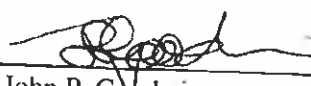
RESOLVED FURTHER, that the Member, hereby authorizes and appoints Graciela Eleta, of legal age, married, executive and resident of Guaynabo, Puerto Rico, María de Lourdes Medina, of legal age, married, attorney-at-law and resident of Guaynabo, Puerto Rico, Jason Muncy, of legal age, unmarried, attorney-at-law and resident of Independence, Kentucky, and Eric J. Wunsch of legal age, married, attorney-at-law and resident of Cincinnati, Ohio to act as authorized signatories of the Company (the "Authorized Signatories") and to enter into, execute, and deliver, on behalf of the Company, the Agreement, the Deed of Conveyance, and any and all other documents, public or private, relating to the disposition and cancellation of any existing liens of the Realty, necessary or required in connection therewith, and to take any and all such other actions relating to or in connection with the foregoing documents, as may be necessary to effectuate the purposes of these resolutions, including their recordation in the corresponding section of the Registry of Property of Puerto Rico, under such terms and conditions as said

person may approve, such approval to be conclusively evidenced by the execution and delivery of any said documents; and,

RESOLVED FURTHER, that the Authorized Signatories are hereby authorized and directed to do, delegate or cause to be done all such acts and things and to make, execute, and deliver, or cause to be made, executed and delivered, in the name and on behalf of the Company such agreements, deeds of transfer, notices to governmental authorities, statements, documents and instruments as may be deemed by any of them necessary or appropriate to fully effectuate the foregoing, and all actions taken in furtherance thereof by any of the Authorized Signatories prior to the date of this Written Consent are hereby ratified and approved in all respects.

IN WITNESS WHEREOF, the Member has signed this Written Consent of the Sole Member of the Company as of the date stated above, in Cincinnati, Ohio.

Olay Company, Inc.
Sole Member of the Company

By: 
Name: John P. Goodwin
Title: Vice President & Treasurer

REFERENCE 34

AG CPS-ms1

[Seal: NOV 4, 1997]



Mr. J. C. Olozaga
President and General Manager
Vicks, Inc.
Apartado V
Cayey, Puerto Rico 00633

Subject: C-AG-74-0033
Vicks Merell
Cayey, P. R.

Dear Mr. Olozaga,

We are writing to you about your request for approval to operate the water pollution control system for the above cited project.

On August 31, 1977, technical personnel from the Water Quality Department inspected such system and found a series of deficiencies. One of the main deficiencies is the continuous discharge of effluent from the system to an adjacent ravine, which is a tributary of the La Plata River, without the issuance of a federal NPDES permit for such discharge. The effluent reaches the ravine through the stormwater sewer.

Originally, the Environmental Quality Board approved the disposal of the effluent from such system to a percolation field. Subsequently, Vicks installed a tertiary filter and requested approval from the Environmental Quality Board to dispose, only during the rainy season, the part of the effluent that could not be percolated to such ravine through the stormwater sewer. Such approval was granted by the Environmental Quality Board.

We are notifying the Environmental Protection Agency (EPA) about this violation. We are giving you fifteen (15) days to specify in writing the reason why the violation was committed, and to submit a request for the federal NPDES permit for the discharge. The original request shall be sent to the EPA regional offices in New York and a copy thereof shall be sent to the Environmental Quality Board.

Mr. J. C. Olozaga
C-AG-74-0033

- 2 -

If these requirements are not met within the granted period of time, the Environmental Quality Board shall take legal action, either independently from the EPA pursuant to Act No. 9 of June 18, 1970 or jointly with the EPA under Public Act No. 92-500 ("Federal Water Pollution Control Act Amendment of 1972").

We would like to point out that we found the following additional deficiencies:

1. A motor of one of the compressors was broken.
2. The effluent contains visible floating solids.

These deficiencies must be corrected within fifteen (15) days following receipt hereof as well.

Please, be warned that this Board is entitled to take legal action, as well as to impose administrative sanctions and penalties of up to USD 25,000, and in case of contumacy up to USD 50,000 for non-compliance with any restriction, regulations or order from the Board under the provisions of the Environmental Public Policy Act.

Sincerely,

[illegible signature]

Carl-Axel P. Soderberg
Interim Director
Water Quality Department

[handwritten] Follow-up
Nov. 28/77 [illegible]

REFERENCE 28

VICKS INC
Box V – Cayey, Puerto Rico 00633

TELEPHONE (809) 738-2191
TELEX 385-5504

CABLE ADDRESS
MERVI

June 1, 1982

*Eng. Julio Pujols,
Head of the Sewage System Division
Aqueduct and Sewage Authority
Apartado 7066
Bo. Obrero, Santurce, PR 00916*

*Re: AAA-U-74-3-25-V-270
Vicks Merrel Nat. Labs.*

Dear Mr. Pujols,

This is a consultation on the discharge of a pre-treated liquid waste to be added to the present load of this company in the sewage service provided by your Agency.

Our company intends to build a plant in the near future for the detoxification of liquid waste generated in the manufacturing of SINEX nasal spray.

This nasal spray is produced and packed in our Cayey facilities, and it contains organic materials with medicinal characteristics and Thiomersal as a preservative. Thiomersal is a mercuric salicylate used as antiseptic and germicide.

Every time a batch of this nasal spray is prepared, all the equipment and lines are sanitized for future use. The water resulting from this cleaning contains traces of the product. Laboratory tests showed that the concentration of mercury exceeded 0.20 mg/liter. For this reason, this waste was classified as hazardous. The current practice is to collect it in 55-gallon drums and store it in a facility contracted for this purpose. In addition to this concentration of mercury, no other substance considered hazardous was found in this waste; in fact, 99 % of this waste is water.

June 1, 1982

In order to remove the toxic characteristic from these waters, a treatment plant has been designed, consisting of: a tank to accumulate the liquid, a system to increase its alkalinity, mechanical mixing, a filter to remove the solids formed when increasing alkalinity (including mercury sulfite), a system of activated carbon beds to absorb non-precipitated mercury, a pump to recycle the liquid through the filter and the carbon beds for as long as necessary to lower the mercury level. The system is designed to treat batches of liquid accumulated over a week, i.e. \pm 500 gallons. A process flow diagram of the system is attached for your information.

The treated liquid will be discharged to the existing treatment facilities of Vicks Inc. These facilities include pH control. The 500 gallons will be added once per week, at a rate of 1.0 gallon per minute. This activity will not cause any significant additional load on the nearly 30,000 gallons per day already discharged by Vicks Inc. into the sewage system from its existing treatment plant.

As additional information, we add that the solids collected in the filter and which will have hazardous characteristics will be handled as per the applicable Federal and State Regulations.

Vicks Inc. respectfully requests you to assess this information and to notify us in writing about your opinion on this consultation.

Sincerely,

[Illegible signature]

*Emilio Escobar
Engineering Manager*

ar

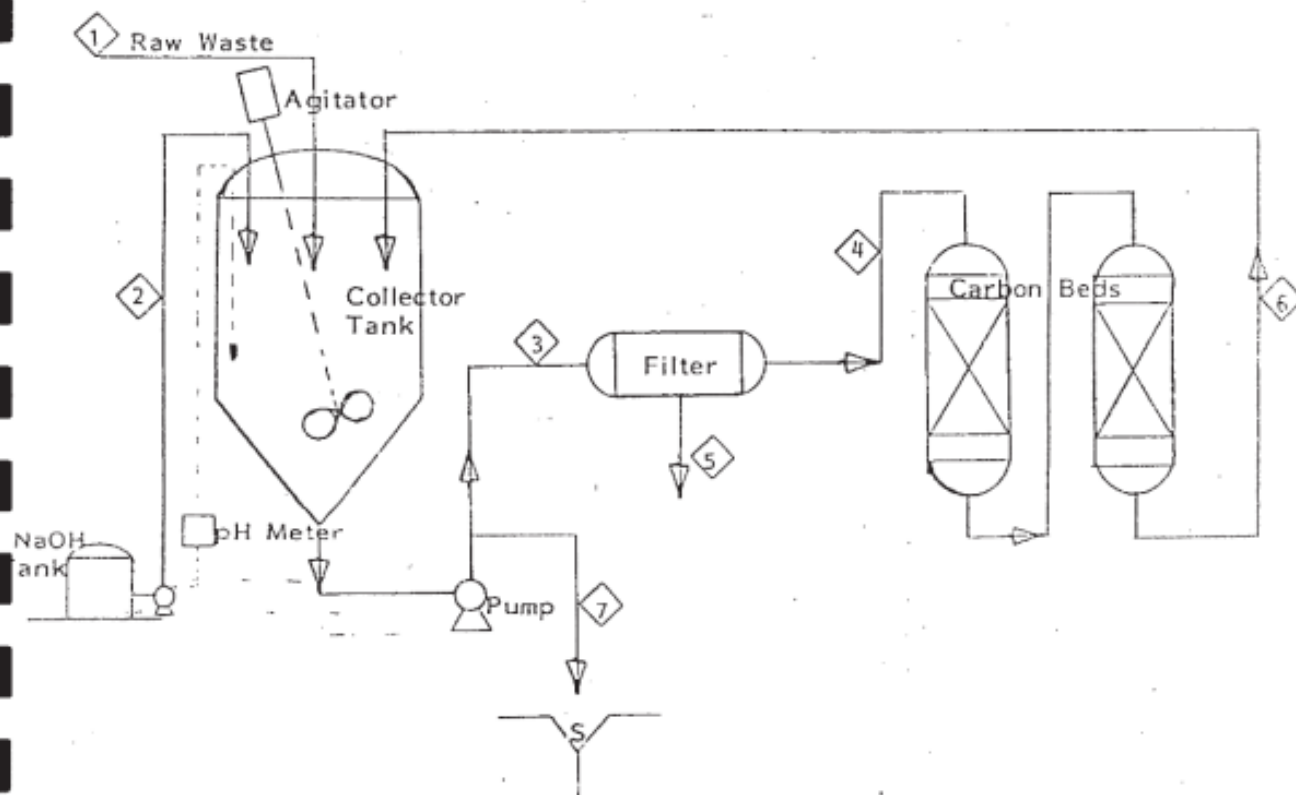
*cc: Eng. Alexander Meléndez
Aqueduct and Sewage Authority (A.A.A.)*

Attachments

Batch: 500 gal of Sinex Wastewater

Component (lbs/hr)	1*	2*	3	4	5	6	7	8			
Water	4,170	83.4	500.4	500.4	--	500.4	500.4				
Total Organic Carbon (ppm)	3,000	--	3,000	1,000	2,000	1,000	500				
Mercury (ppm)	1-3	--	1-3	1-2	0-2	.005-1	0.005				
NaOH (50%)	---	83.4	--	--	--	--	--				
Settleable Solids	---	--	1	0.05	0.95	--	--				
pH	7	13 +	10.5-11	10.5-11	---	10.5-11	10.5-11				

* Batch quantities



Process Flow Diagram
Sinex Wastewater Treatment System

DRAWN S. Colón SCALE N/A
DATE Dec./01/81 SK-

REFERENCE 29

SERVICIOS CARBAREON, INC.

MAILING ADDRESS:
FIRM DELIVERY
PONCE, P. R. 00731

CARR. 385 KM. 3.5 – BO. TALLABOA
PEÑUELAS, P. R. 00724

TEL:
(809) 836-1678
(809) 836-2058

October 2, 1979

Mr. Jaime L. Ortiz Otero, Director
Land Pollution Division
Environmental Quality Board
Apartado 11488
Santurce, P.R. 00910

RE: Vicks-Merrel Request

August 9, 1979

Dear Mr. Ortiz,

You are hereby respectfully requested to reconsider the recommendations given to Vicks-Merrel with reference to the request to dispose liquid waste resulting from its process.

As discussed in the meeting held on October 1, 1979 in the offices of the Hazardous Waste Division, the above mentioned waste contains traces of the Thiomersal compound, which is a mercury-based preservative. The function of such preservative is to maintain the drug Synex in conditions fit for human use. The concentration of this preservative in the drug is 0.001 %. The drug is recommended for nasal decongestion by inhalation when a person is suffering from a cold.

The waste in question is generated from the manufacturing of that drug. The amount of mercury contained in the liquid to be disposed is chemically bound in Thiomersal, and its concentration in the waste is 0.22 mg/liter. Regarding the quantities to be disposed, initially 5,500 gallons will be disposed, containing 0.22 mg/l or 0.22 ppm. This is equivalent to 4.58 grams of mercury.

$$0.22 \frac{\text{MgHg}}{\text{Liter}} \times \frac{1,000 \text{ mg}}{1,000 \text{ mg}} \times \frac{5,500 \text{ gal.}}{1,000 \text{ gal.}} \times \frac{3.785 \text{ liters}}{1 \text{ Gal}} = 4.58 \text{ g Hg}$$

After that, a maximum of 3,000 gallons of liquid may be generated per month. In such case, 29.89 g will be disposed of annually.

$$0.22 \frac{\text{MgHg}}{\text{Liter}} \times \frac{1,000 \text{ mg}}{1,000 \text{ mg}} \times \frac{3,000 \text{ gal.}}{1,000 \text{ gal.}} \times \frac{3.785 \text{ liters}}{1 \text{ gal}} \times \frac{12 \text{ months}}{1 \text{ Year}} = 29.98 \text{ g Hg / year}$$

The concentration of mercury in this waste is such that it cannot be recovered with the existing technology. Moreover, the amount of waste mercury generated makes it economically unfeasible to build any type of facility to attempt such recovery.

[Seal] RECEIVED – OCT 8, 1979 – Solid Waste Program [handwritten] 2084

Considering that mercury is 13.6 times heavier than water, we would be talking about disposing 0.34 ml of mercury initially.

$$4.58 \text{ g Hg} \left| \frac{\text{ml Hg}}{13.6 \text{ g Hg}} \right. = 0.34 \text{ ml Hg}$$

and 2.2 ml of mercury annually.

$$29.98 \text{ g Hg} \left| \frac{\text{ml Hg}}{13.6 \text{ g Hg}} \right. = 2.2 \text{ ml Hg}$$

We had the consideration of making the above calculation for your convenience, since the disposal method proposed by Servicios Carbareón is storing it in evaporation basins to decrease the water volume to a minimum, and then the residual solid waste would be finally disposed of in a field cultivation system along with other waste material. These include waste from petroleum, fish, activated carbon, oils, etc.

In a literature review, we found that the quantity of mercury we are handling is below the quantities allowed for human consumption. For instance, the amount allowed by the Food and Drug Administration in tuna fish in the market is 0.5 mg/liter.

We are aware that Mercury must not enter the food chain, due to its ability to bond with organic compounds. But if the FDA allows it as a preservative in the form of Thiomersal in a product directly linked to the food chain, we trust that whatever our final disposal method may be, it would be safe enough to surpass any other alternative as may arise for the final disposal of this waste..

Our intention is basically to keep that quantity of mercury away as much as possible from any medium that allows it to enter the food chain. I attach literature that helps explain our request for reconsideration.

Thank you in advance for taking time to study our request.

Sincerely,

Cc: J.C. Olózaga, President
Vicks-Merrell
Box M
Cayey, P.R. 00633

SERVICIOS CARBAREÓN, INC
[Illegible signature]
SOL L. COLON
Operations Manager

REFERENCE 30

[Logo]

ENVIRONMENTAL QUALITY BOARD
OFFICE OF THE GOVERNOR
SOLID WASTE PROGRAM

INDUSTRIAL HAZARDOUS AND TOXIC WASTE STUDY

GENERAL INFORMATION

Industry name: [handwritten] Co. Vicks Merrell (4 years in operation)

Local address: [handwritten] Carr. 735 Km 2.3 Cayey

Postal Address: _____

Telephone Number: [handwritten] 738-2191

Type of Industry: _____

Principal Product: [handwritten] Inhalers – Vicks [illegible] of Olay

Owner or General Manager: [handwritten] Joseph Olózaga (President and General Manager)

Person(s) Responsible for the Hazardous or Toxic Waste Management: _____

Total number of employees: [handwritten] 240 – 250

Number of Employees Working Directly with the Hazardous or Toxic Wastes. _____ – _____

STORAGE FACILITIES

I. RAW MATERIAL

A. Storage Station

Location [handwritten] Plant Storage

Condition [handwritten] Good

Containers [handwritten] Cardboard boxes, fiber drums

Comments [handwritten] mineral oil, waxes, perfumes, coconut oil, isopropyl myristate (for cosmetics)

[handwritten] For the production of dugs { Calcium carbonate, carboxypolymethylene, Mannitol, Castor Oil, Aminophylline, Zinc, Mg, tartaric acid, doxylamine succinate, polyvinylpyrrolidone, dibasic phosphate, dibasic dihydrate, quinine sulfite, etc.

II. Hazardous and Toxic Wastes Storage or Re-use

A) Storage [handwritten] Usually, the raw material is not stored for very long. They try to renew the material. It all depends on the supplier.

Containers:

Type _____

Location [handwritten and crossed out] They store it inside the plant in areas for such purpose

B) Re-use

[crossed out] Description [handwritten] In relation to the material contaminated with Hg, it was sent to [illegible] in North Carolina for incineration. It consisted of 6 million Sinex bottles (nasal inhaler).

Collection Facilities

() Municipal System

() Same Industry _____ License # _____

() Private System [handwritten] Browning Ferris _____ License # _____

Other _____

Equipment Description: [handwritten] dumpster – compacter

Collection Frequency [handwritten] Daily

FINAL DISPOSAL OF TREATMENT

SITE

ON OFF

() () Open Burning Dump

() () Land-fill

() () Incineration

() () Compaction

() () Ocean Dumping

() () Sanitary Sewage

SITE

ON OFF

() () Open Dump

() () Mine Disposal

() () Recovery and Re-use

() () Lagooning as ultimate disposal

() () Chemical and Biological Detoxification

() () Other

[crossed out] System Description: [handwritten] Filters for the water of the Aqueduct and Sewage Authority, disposed with the trash. The material or waste from both plants goes to a tertiary treatment plant. Once per year, a company comes and cleans the sludge of the treatment plant. The collected amount is unknown (\pm 15 – 18,000 gal) The company is Servicio Sanitario [crossed out] Comments: Público, Ruiz Belvis 246 Villa Palmeras, Santurce, P.R. They transport it to Caguas. They stated that they have a license from the Board.

In the case of products that fail QC, they only dispose of the bottles, grinding them and putting them in drums that are sent to the dumpster.

[crossed out] Special Treatment: [handwritten] They put the trash that goes to the dumpster in paper bags. The cardboard is sold to Fibers Industrial, Box 626 Hato Rey, approx. 50 ton/month of corrugated [crossed out] Comments: cardboard, 3 trips per week. Empty containers are used to put trash in them. Metal drums are used to put Hg salt waste in them.

Person Interviewed: [handwritten] Mr. Joseph Olózaga

Position: [handwritten] President

Date: _____

Official: [handwritten] Noemí Toledo Maceira

P&G Records & Information Management Policy
and

P&G Records & Information Management Program FAQs
effective October 12, 2020.



P&G RECORDS & INFORMATION MANAGEMENT POLICY

Policy ID: Corp-RM-001

Scope: Global

Effective Date: Oct 12, 2020

Policy Owner: Records & Information Governance

Approver: Chief Ethics & Compliance Officer

Contact: businessconduct.im@pg.com

1.0 POLICY

Records created or received during the normal course of business are Company assets regardless of the medium in which they are created or maintained. All Record Custodians are required to maintain the records within their control consistent with the P&G Records Retention Schedule (RRS) available at the P&G Global RRS Application Webpage [<http://retentionschedule.pg.com/>].

- 1.1 Record Custodians are required to review the records within their control at least once per year. Company retention times in the RRS are an approval to dispose of Company records.
 - 1.2 When reviewing the records within their control, record custodians should confirm the records are accurate, authentic and trustworthy. If any records are deemed inaccurate, inauthentic, or untrustworthy, the record custodian must take steps to correct the flaw or outage.
 - 1.3 Employees who have responsibility for third-party Record Custodians must assist and hold those third-parties accountable for complying with this policy.
 - 1.4 Record Custodians who move to a new assignment or who leave the Company must ensure their records are properly transferred to a new Record Custodian.
 - 1.5 Record Custodians must retain information for legal proceedings as instructed by an Attorney or Legal Manager regardless of the retention time stated in the RRS.
-

2.0 COMPANY INTENT

In conducting daily business, P&G generates and receives a large amount of paper and electronic records. It is the intent of P&G to identify, retain, and safeguard all records in accordance with business needs and applicable legal requirements, and in an efficient and effective manner. To accomplish this, employees must regularly review the generation, storage and disposal of Company records.

3.0 POLICY EXCEPTIONS

Any request for a policy exception should be directed to businessconduct.im@pg.com.



4.0 SCOPE

This Policy governs all Company Records from their creation to final disposition. All Record Custodians and P&G Employees who have responsibility for third-party Record Custodians must comply with this policy.

5.0 DEFINITIONS

Company Record: Any record, information or data, regardless of the medium in which it is stored, related to Company business activities that is generated or received during the normal course of business.

Record Custodian: Any employee, vendor or business partner who creates or stores Company Records.

6.0 ENFORCING THE POLICY

Make sure you understand and comply with this Policy and seek help if you have any questions about the proper course of action. You are expected to report any known or suspected violations of this policy through available Company resources. Reports will be investigated promptly. No one who participates or cooperates honestly and completely in the P&G investigation of a report will be subject to retaliation for doing so.

Violating this Policy may result in disciplinary action, in line with local laws, up to and including termination.

REFERENCE DOCUMENTS & RELATED POLICIES

- [Worldwide Business Conduct Manual](#) Employees should specifically review:
 - Records & Information Governance (page 27)
- [Records Retention Schedule Home Page](#) Employees may wish to review:
 - P&G Records & Information Management Program FAQ's
 - Standards for Reading & Applying Record Retention Times
 - Standards for Requesting a Change to the RRS
 - Guidelines for Reviewing ESI for Disposal
- [IT Policies](#) - Policies and Standards for managing Company records.
- [Privacy Central](#) - Information for managing records that contain Personally Identifiable Information (PII).



P&G Records & Information Management Program FAQs

Policy ID: Corp-RM-001-1

Scope: Global

Effective Date: Oct 12, 2020

Policy Owner: Records & Information Governance

Approver: Chief Ethics & Compliance Officer

Contact: businessconduct.im@pg.com

Who Governs the Records & Information Management Policy?

The Records & Information Governance (R&IG) group has governance responsibility for all company records and has the authority to manage the P&G Records & Information Management Program. This includes administration of P&G global policies, standards and guidelines regarding the management of company records and responsibility for maintaining the P&G Records Retention Schedule, tools, and training. In addition, R&IG tracks compliance and provides consulting to projects and initiatives. The Chief Ethics & Compliance Officer is responsible to assure that the Company maintains a legally compliant records retention program and provides operational direction and guidance to the R&IG.

What is the P&G Records Retention Schedule?

The Records Retention Schedule (RRS) is the official P&G policy that designates the period of time company records are retained. The RRS is a list of the types of records generated by the Company, and shows the name of the record, its description, the official record holder, and how long the original and any copies may or must be retained.

The RRS is accessible via the RRSweb application to anyone with access to P&G's network. The application allows a person to search the RRS to find the correct records series for their company records. A person can create their own list of applicable records series which update with changes when accessed. The RRSweb application is located at (<https://retentionschedule.pg.com/>).

Guidance for Common Record Types

- **Drafts:** Discard upon approval or first use of final version.
- **Phone Messages/Note Slips** – discard after required action has been taken.
- **Correspondence:** All correspondence (e-mail, memo, letter, fax, etc.) is managed on content. Example: Emails about the department budget follow the retention time for department budgets.
- **Electronically Stored Information (ESI):** ESI is a Company record and subject to the Records & Information Management Program. ESI requires additional considerations/controls to ensure it remains usable and trustworthy as evidence of business activities. These controls are described in the Managing Electronically Stored Information policy. Business owners in conjunction with IT may decide when ESI records are on-line, near-line, or off-line during their retention time.
 - ESI created or received by the company during the normal course of business is covered by this policy, including ESI stored with external service providers. This includes but is not limited to, images, x-ray, data, video, text, e-mail, web pages, instant messages and voicemails that are captured in an electronic format.
 - ESI must be managed in a way that maintains its accuracy, authenticity and trustworthiness to support business activities. Disposal must be done in a manner that ensures the ESI cannot be easily reconstructed.



- When ESI is moved, the process must ensure the content, context, structure and metadata of the ESI is retained to maintain trustworthiness.
 - **Instant Messaging:** The Instant Messaging (IM) system will not automatically capture conversations. If the content of an IM is important to support a business activity, the IM can be captured by saving the IM and follow the appropriate company retention time.
 - **Electronic Signatures:** When ESI is created with electronic signatures those signatures are considered equal to traditional handwritten signatures. Electronic signatures need to follow a process that ensures the authenticity of the signer and integrity of the signature. Traditional handwritten signatures that are scanned and attached to an electronic file are not acceptable as an electronic signature when this type of signature is required by law.
- **Abandoned ESI Systems/Applications:** ESI that is stored in systems/applications that have been replaced or no longer used must still be maintained until the ESI can be lawfully disposed of in accordance with the RRS. The business owner works with their technical/service support to develop a decommissioning plan and ESI migration/disposal plan.
- **Legal Hold:** P&G must retain certain Company records related to pending or in-progress legal proceedings. A “Legal Hold” will be issued with respect to these records by the Legal Department, which will require that the Record Custodian maintain the records until the Legal Hold is released, regardless of the retention time specified in the RRS. The Attorney or Legal Manager responsible for the hold will share specific direction to any Record Custodian who is subject to the Legal Hold.

P&G Records & Information Management Policy

October 18, 2017

and

P&G Records & Information Management Program FAQs
effective October 18, 2017



P&G RECORDS & INFORMATION MANAGEMENT POLICY

Policy ID: Corp-RM-001

Scope: Global

Effective Date: Oct 18, 2017

Policy Owner: Records & Information Governance

Approver: Chief Ethics & Compliance Officer

Contact: recordshelp.im@pg.com

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- [Worldwide Business Conduct Manual](#) Employees should specifically review:
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 - Standards for Requesting a Change to the RRS
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- [Information Security](#) Employees may wish to review:
 - Standards for End User Controls (disposal information)
- [Privacy Central](#)



P&G Records & Information Management Program FAQs

Policy ID: Corp-RM-001-1

Scope: Global

Effective Date: Oct 18, 2017

Policy Owner: Records & Information Governance

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- **Legal Hold:** P&G must retain certain Company records related to pending or in-progress legal proceedings. A “Legal Hold” will be issued with respect to these records by the Legal Department, which will require that the Record Custodian maintain the records until the Legal Hold is released, regardless of the retention time specified in the RRS. The Attorney or Legal Manager responsible for the hold will share specific direction to any Record Custodian who is subject to the Legal Hold.

2/5/2021 Schedule

P&G Records Retention Schedule and Retention Time Key

[Send To Printer](#)

Do not keep a printed or extracted RRS. They do not update with changes. USE THEN LOSE!

Hold records required for litigation until released.

For records with Official Retention of 'CNTRY', review video #8 'CNTRY Retention Time' training in the I Need Help button.

These Schedules Records Are Produced From A User Search Screen. They Are NOT Part Of A Standardized Schedule And Shouldn't Be Distributed

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>1099's/1099B's/1042's</u>	Review Country Hold List before disposal. Record of payments reflecting what the company paid each calendar year to a person or vendor. Forms filed with IRS, including 1042, 1099, W-8 BEN, W-9, 8233 and supporting documentation.	MAX1	CNTRY	Retirement Planning; Accts Payable; Tax Compliance Group;	F&A1000
<u>A/R Annual Invoicing Summaries</u>	Annual reports and trend analysis, generated by accounts receivable to share results, measure efficiencies, communicate business needs, etc.	MAX1	5	Accounts Receivable;	CSL1010

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Accounting Activities & Actions</u>	ILM review process. Includes many of the records that document accounting activities that support revenue/tax audits (IRS, or equivalent). Examples, registers, write-offs, SRAP, dividend ledger, chart of accounts, put options, general ledger (GL), sub-ledger, RE authorizations for MSA spending, journal entries, letters of credit, FIFO inventory, site inventory adjustments (including scrapping), technology licensing and donations, adjustments, research credit, stock repurchase, foreign exchange, investments, year-end close, year-end/bank reconciliations and supporting calculations. Review and disposal of Official records retained in centralized corporate systems (e.g., SAP *5P, *6P, *7P, ANP, G4P) follow the ILM process.	MAX3	CNTRY	Production Execution; Financial Serv;	F&A1064
<u>Acquisition/Divestiture/Mergers</u>	Review Country Hold List before disposal. Records related to the sale and creation of new entities including records of former entities that have not been integrated into other company records. Includes financial analysis, monetary arrangements and equity stake purchases. Excludes A&D Contracts (F&A5000).	MAX3	CNTRY	Legal; Human Resource; General Ledger;	LEG1030
<u>Acquisition/Divestiture/Mergers - Tax</u>	After active period, review Country Hold List before disposal. Records for tax purposes with supporting documentation for due diligence, valuation analysis, pre-pool data, merger summaries, foreign currency translations (e.g. 987 files), proceeds allocations, A&D contracts and other documentation, various contract document, transitional service agreements. LOCE = Life of corporation/entity	MAX5	LOCE+CNTRY	Tax;	F&A5000

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Acquisition/Divestiture/Mergers Non Completed</u>	Includes analysis of potential A/D/M and equity stakes activities that did not transpire. ACT = while under consideration	MAXACT	ACT+3	Legal;	LEG1005
<u>Actual BS/P&L Rates</u>	Review Country Hold List before disposal. Records documenting the month-end balance sheet (BS) and year-to-date profit loss (P/L) rates.	MAX3	CNTRY	FX/Com;	F&A1030
<u>Ad Copy & Claims - OTC / Medical Devices</u>	Ad (advertising) copy approval and proof of claim statements with supporting documentation for OTC Drugs and Medical Devices (medical devices, including denture adhesives, or products containing active drug ingredients, e.g., toothpaste, antiperspirant, anti-dandruff, anti-acne products, etc.).	MAX3	10	R&D;	LEG3060
<u>Ad Copy & Claims - Other</u>	Ad (advertising) copy approval and proof of claim statements with supporting documentation for non-OTC Drug / Medical Devices (products that are not medical devices, and products that do not contain active drug ingredients, e.g., paper towel, detergent, etc.).	MAX1	3	R&D;	LEG3070
<u>Advertisements</u>	Documentation of printed advertising products. Includes direct mail copy, newspaper ads. flyers, FSCI's (free standing inserts) & posters.	MAX3	6	GBU Marketing;	MKG3000
<u>Advertising Development File</u>	Documents the preparation of TV/radio commercials and print advertisement. Includes message development, script, music, creative briefs and media plans. ACT = until advertisement is no longer in circulation or aired	MAX3	ACT+MAX3	GBU Marketing; Advertising Dev;	MKG1015

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Affirmative Action Plans & Audits</u>	Annual reports summarizing the ethnic/minority diversity of the company. Includes analysis of salary, promotion, position, plan summaries, audits and follow up action plans.	MAX3	3	Human Resource;	HUM1060
<u>Aircraft Maintenance</u>	Records detailing maintenance and service performed on an aircraft including airworthiness release. Includes alterations, 337 forms etc. ACT = until next service	MAXACT	ACT+2	Airplane Ops;	BUS8040
<u>Aircraft Service Record</u>	Documents the aircraft's time in service including inspection status, service/overhaul dates, airworthiness directives, major aircraft alterations, etc. Records follow aircraft when sold, etc. ACT = while plane is in service	MAXACT	ACT	Airplane Ops;	BUS8050
<u>Animal Care</u>	Animal Health Care Sheets, maintenance and tracking records.	MAX3	10	Central Records; R&D;	R&D2035
<u>Annual Product Report</u>	Annual report to outside agency i.e. Food & Drug Administration (FDA) or international equivalent.	MAX3	6	Central Records; R&D; QA;	PSO2090
<u>Annual Report - Certified</u>	Review Country Hold List before disposal. Financial Statement, reports (FAS87, etc.) submitted to government agencies. Includes supporting documentation.	MAX3	CNTRY	Submitting Dept;	F&A1040
<u>Annuity Transaction Records</u>	After active period, review Country Hold List before disposal. Records documenting purchases of annuities that the company transacted for retirees. ACT = life of annuity	MAX3	ACT+CNTRY	Retirement Planning; Global Pensions;	HUM1050

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Audit - Internal</u>	Internal audits, findings, planned actions and supporting information for accounting systems, policies and procedures and other control audits. Includes public audit issue entries and their remediation.	MAX3	7	Internal Control;	BUS9015
<u>Audit - Self Assessments</u>	Any internally directed self-audit assessment on business controls, policy/process/legal/product compliance, accounting accuracy, security and risk. This includes Control Self-Assessments (CSA), and Self Improvement Program (SIP) audits. Records include findings, reports, supporting work papers, issues and planned actions.	MAX3	3	Audit Owner; QA; Global Internal Audit;	BUS2010
<u>Audit Adjustments & Assessments</u>	After active period, review Country Hold List before disposal. Notices of proposed adjustments (NPA's) issued by tax authorities as well as actual assessments. LOCE = Life of corporation/entity	MAX5	LOCE+CNTRY	Tax;	F&A2065
<u>Audit Process</u>	Documents the activities before and during an audit by a government revenue agency. Includes but not limited to audit plan, affirmative claims, meeting notes, pre-work provided to revenue agency, agency information requests. ACT = current audit cycle	MAXACT	ACT+5	Tax;	F&A1005
<u>Audits - External Qualification</u>	Audit reports that affect the approval / disapproval of a P&G contractor, vendor or supplier. May include chemistry, product, method and security qualifications.	MAX3	10	Legal; Audit Owner; QA;	BUS7080

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Audits - QA</u>	Records and supporting work papers related to periodic internal and external quality assurance (QA) auditing that provide an assessment of quality related risk associated with a supplier. The assessments will be based on standards noted in MAT-S-07.	MAX5	15	QA;	BUS7090
<u>BGP Calculations</u>	Review Country Hold List before disposal. Business Growth Program (BGP) calculations with supporting documentation for officers of the company. Calculations based on total company performance.	MAX3	CNTRY	Corporate Finance;	F&A2000
<u>Banking Agreements - EU</u>	Records outlining agreements with financial institutions on transactions such as swaps, foreign exchange and derivatives. ACT = life of agreement	MAXACT	ACT+10	Treasury;	LEG4060
<u>Batch Records - PS / R&D</u>	Batch records involving production, packing and labeling records for products sold to the consumer or for preclinical/clinical trials. Includes raw material, production, quality records, test market records, chemical development records, experimental orders, certification / characterization lot, use and risk assessment tests. Note: In a continuous process, a batch is a 24-hour day or until change over.	MAX3	6	Central Records; Product Supply; QA;	PSO1010
<u>Benchmarking</u>	Documentation comparing key statistics of organizations to that of other organizations or areas, i.e., compensation benefits, performance levels, cost, budgets, procedures.	MAX5	MAX5	Benchmark Owner;	BUS1020
<u>Benefit Health Test</u>	Employee health testing results from a P&G provided test to check for the presence of the coronavirus virus. ACT = until testing is discontinued	MAXACT	ACT+2	Health Services;	HUM1040

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Benefit Plan Committee</u>	<p>After active period, review Country Hold List before disposal. Records related to benefit plan meetings including meeting minutes, direction and decisions by the Policy Committee and Trustees.</p> <p>ACT = while plan is current</p>	MAX3	ACT+CNTRY	Retirement Planning; ES Benefits;	HUM2050
<u>Benefits - Long Term</u>	<p>Account of former employees who created a retirement account (e.g.401k), qualify for P&G retirement benefits or joined a pension plan. Includes personally identifiable information (PII), Benefit/retirement/pension plans, 401 calculations, authorizations, group life insurance reports, health insurance, beneficiary designations, contribution history, payments, etc. Certain information may be deleted after employment when no longer needed.</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pc.com; E002, (Pensions), E007 (Benefits and Insurances (Health/Life/ADD/Disability)).</p>	MAX3	75	Retirement Planning; Global Pensions; Benefits;	HUM4025

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Benefits - Short Term</u>	<p>Records of benefit plan claims. Includes but not limited to benefit plan reviews, benefit claims (includes claim detail, appeals & resolution), disability claims (includes calculation & payment authorization), leaves of absence (e.g. Family & Medical leave Act, FMLA or equivalent).</p> <p>ACT = until closed/superseded</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E005 (Benefits and Insurances (Health/Life/ADD/Disability), E020 (Employee Assistance Programs), E041 (Wellness programs), E170 (On-Site/Sponsored Day Care).</p>	MAXACT	ACT+6	Human Resource; Benefits; Employee Serv;	HUM1002
<u>Benefits Enrollment</u>	<p>Records and documentation pertaining to the personal choice of elections and enrollment of employees into company benefit plans.</p> <p>ACT = benefit period</p>	MAXACT	ACT+3	Retirement Planning; ES Benefits;	HUM2040
<u>Bills of Lading (BOL)</u>	Documentation of actual shipments (non export/import) and receipts including adjustments to reflect any overages/shortages. Includes US Hazardous Goods BOL.	MAX1	2	Shipping Office; Site HSE;	CSL1030
<u>Biography</u>	<p>Records detailing background information on a particular person. Includes external and internal documents.</p> <p>ACT = while current, if record is kept in electronic record system, check with Corporate Archives before purging</p>	MAXACT	ACT+CA	Investor Relations; Corp Communications; Global Sustainability;	EXR1010

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Board Committee Books/Packages</u>	Records created prior to the board committee meetings that provide status information for specific functional results.	MAX3	MAX20	Creating Comm;	BUS1030
<u>Bond Files</u>	After active period, review Country Hold List before disposal. Records detailing the companies bond securities. Includes terms and agreements of the bonds, approval to execute, initial terms sheet and the offering prospectus. ACT = Term of bond	MAX3	ACT+CNTRY	Legal; Capital Markets;	F&A2010
<u>Bond Financing</u>	Records regarding SEC bond financing. ACT = bond period	2	ACT+6	Legal;	LEG1060
<u>Budget Projection Reports</u>	Summary evaluation report with supporting documentation for board members on how each organization's budget is doing as compared to their approved budget. ACT = current fiscal year	MAXACT	ACT+5	Corporate Finance;	F&A2020
<u>Building Design & Layout Records</u>	Records related to design, construction and layout of buildings, equipment (HV, AC, etc.) and facilities. May include design manuals, drawings, blueprints, risk studies and construction photos detailing design features, etc. ACT = life of equipment/building	MAXACT	ACT+6	Engineering;	ENG1020
<u>Building VAT - Belgium</u>	Value Added Tax transaction records related to the construction or acquisition of a new building.	MAX3	15	Financial Serv;	F&A1068

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Business Continuity Planning</u>	Risk analysis, planning materials and action plan related to building a site/function risk mitigation and Business Continuity Plan (BCP) including disaster recovery plans. ACT = current plan and testing results	MAXACT	ACT+MAX3	Policy Owner;	BUS1040
<u>CEO Communications</u>	Records related to CEO communications (e.g. speeches, financial analyst briefing, employee video, Intranet communications, media briefing, Annual Report CEO letter) with supporting documentation. ACT = while current, if record is kept in electronic record system, check with Corporate Archives before purging	MAXACT	ACT+CA	Corporate Archives;	BUS1050
<u>COPA Summary</u>	ILM review process. Controlling Profitability Analysis (COPA) provides the analysis of a finished product's cost and profitability by evaluating TDC (Total Delivered Cost) at standard against the current material Cost Estimate (TMC - Total Manufactured Cost) and Peg Rates (FPLC - Finished Product Logistic Cost). May also include MSA, SRAP and other income and expenses extracted from the SAP FI module at the Month End. Review and disposal of Official records retained in centralized corporate systems (e.g., COPA BW [online & NLS]) follow the ILM process.	MAX3	CNTRY	Acct & Fin Rpt;	F&A9046
<u>CPG Customer Information</u>	Database used to monitor activities and results for the Commercial Product Group (CPG). May contain customer information including business name, address, contacts, activities, requests, and sales propositions and opportunities.	MAX1	5	Commercial Product Group;	MKG4050

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Campaign & PAC Files</u>	Review Country Hold List before disposal. Record of P&G's support for political issues and campaigns. Includes but not limited to Political Action Committee contributions, certification of submissions to State Office, Hamilton County and supporting documentation.	MAX3	CNTRY	Govt Relations;	EXR1080
<u>Cancelled Stock Certificates</u>	Original stock certificates cancelled as a result of transfer, safekeeping or sale.	MAX3	75	Shareholder Svcs;	F&A2030
<u>Capital Asset Records</u>	ILM review process. Records related to an individual asset creation, transfer and disposal. Includes Fixed Asset Disposition Order (FADO) and/or sale, depreciation schedules, supporting documentation and project-related records in GBP. Review and disposal of Official records retained in centralized corporate systems (e.g., SAP GBP) follow the ILM process. ACT = life of asset in P&G	MAX3	ACT+CNTRY	Financial Serv;	F&A2040
<u>Career & Skill Development Tracking</u>	Records documenting the assignment plans and skills of individuals. Information compiled from HR SAP and individual input. ACT = until superseded	MAXACT	ACT	Human Resource;	HUM2060
<u>Certificate of Analysis</u>	COA shows the qualitative analysis of non-drug material purchased against our raw material specifications.	MAX3	6	Central Records; Product Supply; R&D;	R&D2040
<u>Certificate of Residence</u>	Records indicating proof of residency including I-9, Green Card, etc. ACT = life of employment	MAX3	ACT+3	Human Resource; Payroll;	HUM2070

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Chemical Volume Tracking - Other</u>	All documentation related to the registration or pre-registration of a chemical substance including finished products, formula codes, raw materials, customers shipped to, volumes and dates of shipping and receiving, meta information relevant to specific legislations, sites and legal entities.	MAX1	5	Gbl Prod Stwdshp;	PSO3060
<u>Chemical Volume Tracking - Standard</u>	<p>For countries following the EU requirements. All documentation related to the registration or pre-registration of a chemical substance including finished products, formula codes, raw materials, customers shipped to, volumes and dates of shipping and receiving, meta information relevant to specific legislation, sites and legal entities.</p> <p>ACT = retain until no longer in use</p>	MAX3	ACT+10	Gbl Prod Stwdshp;	PSO3055

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Clinical Research</u>	<p>Human clinical studies for new, modified, or marketed investigational products (regardless of regulatory status or region of conduct). Includes all Trial Essential Documents not limited to informed consents, training records, delegation logs, manuals, completed case report forms, Clinical Trial Agreement (CTA), Ethic Committee submission/approval, Protocol, Clinical Investigation Report, and Clinical Trial Master File (TMF) which may include but not limited to clinical data, reports, pre-clinical data, product making/supply/release records, manuals, correspondence, analytical tests, methods, Investigator's Brochure (IB), etc. as required by regulations for substantiation of trial conduct.</p> <p>ACT = while product is authorized for marketing</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; C025 (Clinical Research).</p>	MAX5	ACT+30	Central Records; R&D; Clinical;	R&D2059
<u>Comment Codes</u>	<p>Master table of comment codes. Used for consistent comment coding across the company.</p> <p>ACT = while comment code is still in use by the company.</p>	MAXACT	ACT+5	Consumer Relations;	MKG1010
<u>Commercials - TV/Radio - Non P&G</u>	Non P&G TV commercials. Includes competitors and non competitors commercials.	MAX10	MAX100	Marketing Exchange;	MKG1030
<u>Commercials - TV/Radio - P&G</u>	P&G TV and radio commercials. Retain at least while commercial is "On Air".	MAX10	MAX100	Marketing Exchange;	MKG1035

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Communication Plans</u>	Records detailing the plans for communicating a major company announcement that includes supporting documentation such as Q&A, etc. ACT = while active, if record is kept in electronic record system, check with Corporate Archives before purging	MAX3	3CA	Investor Relations; Corp Communications; GBU;	EXR1020
<u>Company Life Insurance</u>	After active period, review Country Hold List before disposal. Records related to life insurance contracts on a fixed group of employees used to fund an employee benefit program. Includes correspondence, backup transactions, copies of GL reports. (COLI1, COLI2, directors CAP, Noxell ESIP, TOLI) ACT = life of benefit program	MAX3	ACT+CNTRY	Global Pensions;	HUM2090
<u>Compensation Committee - Minutes</u>	Records related to the minutes, direction and decisions by the compensation committee. LOCE = life of corporation/entity	MAX1	LOCE+10	Secretary Office;	HUM3030
<u>Compensation File - Australia</u>	Record on employee injury resulting in missed work and may include insurance activity, claims, medical report, medical certificate, rehabilitation and return to work plan and government accident report. ACT = until employee leaves / retires from the company	MAX1	ACT+30	Human Resource;	HUM7005
<u>Complaint Letters</u>	Letters of complaints including those from employees and the general public to HR, or Company Executives regarding employee relations.	MAX3	3	Human Resource;	HUM3050

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Compliance - Incident</u>	Reported incidents (e.g. ethics, fraud, security) from employee help line or other contact. May include investigation with supporting details, disciplinary/action steps and follow up by an investigator. Certain data may be masked and only viewed by authorized personnel. To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E013 (Investigations).	MAX1	6	Global Ethics & Comp;	BUS3040
<u>Compliance - Report</u>	High level data and reports showing trends in incidents (e.g. ethics, fraud, security) over multiple years.	MAX3	10	Global Ethics & Comp;	BUS2080
<u>Computer Metrics Logs</u>	Logs that capture use of a system or site for reporting (i.e. site visit counts, data volume, etc.).	MAX1	MAX1	Information Technology;	BUS1076
<u>Computer Security Logs</u>	Log that monitors system and network security intrusions and attempts. To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E025 (Employee Monitoring).	MAX1	MAX1	Information Technology;	BUS1072
<u>Computer System Data - Development/QA</u>	Test records created in development, QA systems, applications. Includes business and technical test records.	MAX3	MAX3	Information Technology;	BUS1060
<u>Computer System Logs</u>	Log that monitors the system operational status/issues and transaction activities (e.g., operating status, bandwidth, traffic, creations, retrievals, updates, deletion [i.e. CRUD] activities.).	MAX90D	MAX90D	Information Technology;	BUS1074

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Computer System Qualification - Business</u>	Records documenting the qualification / verification of computer systems regarding equipment and software including enhancement requests, incidents and change control. ACT = life of system	MAXACT	ACT+3	Information Technology;	BUS1080
<u>Computer System Qualification - Financial</u>	After active period, review Country Hold List before disposal. Records documenting the qualification / verification of computer systems regarding equipment and software including enhancement requests, incidents and change control. ACT = Life of System	MAX3	ACT+CNTRY	Information Technology;	BUS1090
<u>Computer System Validation</u>	Records documenting the qualification / verification (IQ/OQ) of computer systems regarding equipment and software including enhancement requests, incidents and change control in compliance with Food & Drug Administration (or other international equivalent). ACT = life of system	MAX3	ACT+8	Information Technology; Central Records;	BUS2000

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Consumer & Customer Comments</u>	<p>Non health-related complaints on medicinal and non-medicinal products including those used in Clinical & Consumer Studies along with general inquires on marketed products. Issues include but not limited to preference attributes e.g. color, product count, broken seal, taste, fragrance. Includes summary reports, comment files, investigation records, communications and supporting literature searches.</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; C015 (Local Consumer Contact Handling), C016 (Global Consumer Contact Handling), C017 (Consumer Complaint Investigation).</p>	MAX3	6	QA; Consumer Relations; Gbl Prod Stwdshp;	R&D1030
<u>Consumer & Product Analysis</u>	<p>Profiles and summaries from test used to establish consumer's use and expectations of a product and material performance. Used to develop new products or changes to current products. May include household data, summaries, product usage, quality issues and attitudes contained in various sources such as Neilson Reports. Signed consumer test CDA's (Confidential Disclosure Agreement) are discarded after the tests are completed.</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; C036 (Enterprise Connected Products Platform), C037 (Internet of Things ("IOT") Devices).</p>	MAX3	10	Product Development;	R&D1020

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Consumer Information</u>	<p>RETENTION TIME: Is either opt-out date plus 50 months maximum or 50 months maximum of inactivity. Check with local resources for other possible restrictions. Any information or combination of information on a consumer's personal data, (PII-personally identifiable information, e.g., name, e-mail/ mailing address, mobile number, etc.) collected during a Postal, Mobile web/app, SMS, and Internet/Online account. May be used to maintain a relationship and includes linked data (e.g., activity, purchase history, preferences).</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; C001 (Postal Mailings), C002 (Email Campaign Sending), C003 (SMS Campaign Sending), C004 (Personal Data Management on P&G's Consumer Data Management Platforms), C012 (Loyalty Rewards Membership), C014 (Word of Mouth (Ambassadors from our CDMPs), C018 (Third Party Consumer Registration/Opt In), C019 (P&G Consumer Registration/Opt In), C020 (Consumer data Enrichment), C023 (Business to Business), C024 (Professionals Education), C032 (Direct Marketing Prospects database with P&G data).</p>	MAX1	MAX50M	Consumer Relations; GBU;	R&D1051
<u>Consumer Touch Points</u>	Marketing concept document that is generated for each project showing how the touch points have been incorporated.	MAX3	5	R&D;	R&D1090

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Contracts & Agreements - Other</u>	<p>Documents the obligations between P&G and outside parties. Includes but not limited to contracts, banking agreements and memorandum of agreement (MOA) for products, services, sales, e transportation, leases, property and construction, talent, licenses, promissory notes, financial activities (foreign exchange, derivatives) confidentiality (CDA's), guarantees/warranties. Some contracts are kept within SAP as a price master list to a purchase order (PO).</p> <p>ACT = life of contract</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E110 (Collaboration Agreements with Academic/Research Institutions & Related Third Parties), C030 (Basic Legal Warranty Event Tracking), C031 (Warranty Extension Oral-B).</p>	MAXACT	ACT+6	Legal; Treasury; Contract Owner;	LEG2000
<u>Contracts - IP</u>	<p>Records related to obligation between P&G and outside parties regarding Intellectual Property (IP). Includes but not limited to products, confidentiality (CDA's) guarantees/warranties.</p> <p>ACT = life of contract</p>	MAXACT	ACT+15	Legal;	LEG2010
<u>Control Software Programs</u>	<p>Flow diagrams, documentation and electronic records of programs downloaded into Program Logic Controllers (PLC).</p> <p>ACT = until superseded</p>	MAXACT	ACT+6	Engineering;	ENG1010
<u>Copyright & Trademark Payments</u>	Copies of invoices and proof of payment for copyright and trademark registrations.	MAX3	10	Legal;	LEG2050

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Copyrights/Trademarks</u>	Records related to preparation, filing, maintenance, and rights. Records of rights conveyed by government granting exclusive ownership of a mark, motto, device, or emblem. ACT = life of copyright/trademark	3	ACT+6	Legal;	LEG4040
<u>Corporate Meetings</u>	Includes minutes and notices from board, shareholder and corporate committee meetings. LOCE = life of corporation/entity	2	LOCE+10	Legal;	LEG2070
<u>Corporate Retention Schedule</u>	List of record types used in P&G globally. May include record name, description, official/copy retention times, official record holder, etc.	30D	20	Corp Records Mgmt;	BUS8030
<u>Court Orders</u>	After active period, review Country Hold List before disposal. Court orders that effect an individual's retirement plan account. Includes, (QDRO) Qualified Domestic Relations Orders, spousal consent, birth certificates, marriage certificates. ACT = while court orders are in effect	MAX3	ACT+CNTRY	Retirement Planning;	HUM3070
<u>Creative Brief</u>	Records used to brief or update agencies on the specific objectives or messages concerning a project, initiative or issue. ACT = while project, initiative or issue is current, if record is kept in electronic record system, check with Corporate Archives before purging	MAX3	ACT+CA	Investor Relations; Corp Communications; Global Sustainability;	EXR1030

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Credit Agency Letters</u>	Letters from Credit Agencies claiming outstanding invoice payments to vendor. May include invoice copy, correspondence, etc. ACT = claim is closed	MAX1	ACT+1	Accts Payable;	F&A7070
<u>Critical Statistics - HSE - Corp Level</u>	Health, Safety and Environmental documentation, database and reports summarizing all GBU & sites KE ratings, injury rates and results. Includes environmental statistics (i.e. energy usage & waste generated), qualification of resources and compliance issues and progress.	MAX3	30	Corporate HS&E;	HSE1000
<u>Critical Statistics - HSE - Site Level</u>	Health, Safety and Environmental documentation, database and reports summarizing all GBU & sites KE ratings, injury rates and results. Includes environmental statistics (i.e. energy usage & waste generated), qualification of resources. ACT = until superseded	MAX3	ACT+3	Site HSE;	HSE1010
<u>Critical Statistics - Medical - Corp Level</u>	Medical documentation, database and reports summarizing all GBU & sites medical demographics and results.	MAX3	30	Corp Medical;	HUM3080
<u>Customer Orders - Entry</u>	Records and documentation from customers used a input into order entry system. ACT = shipped date To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; C028 (Ecommerce).	MAXACT	ACT+90D	Cust Serv & Logistics;	CSL1050

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Customer Orders - Processed</u>	ILM review process. Processed customer orders including, customer name, product amount and shipping information. Review and disposal of Official records retained in centralized corporate systems (e.g., SAP *5P, *6P, *7P, ANP) follow the ILM process.	MAX3	CNTRY	Financial Serv; RPCS;	CSL2040
<u>Customer Trade Fund Communications</u>	Review Country Hold List before disposal. Records maintained by the Account Handler supporting the company's different Trade Funds (i.e., BDF, etc.). Includes customer "deal sheets" prepared by company representative and given to customer, payment requests, communications and accrual customer information.	MAX3	CNTRY	CBD Retail;	MKG1000
<u>Customer Trade Fund Development</u>	Records used in creation and development of Customer Trade Fund programs Includes contract templates, form, principles, procedures and guidelines used to support Go To Market strategy and funding.	MAX3	10	CBD Retail;	MKG2020
<u>Customs Classifications</u>	Cross reference of item classifications for import/export. ACT = life of product or goods imported/exported	MAXACT	ACT+5	Cust Serv & Logistics;	CSL1060
<u>Department Budget</u>	Documents and work papers related to the past, current or forecast department budget.	MAX3	3	SRAP;	F&A3070
<u>Deposits & Payments</u>	ILM review process. Includes deposits, canceled checks, wire transfers & bank statements. Review and disposal of Official records retained in centralized corporate systems (e.g., SAP GMP) follow the ILM process.	MAX3	CNTRY	Financial Serv;	F&A2061

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Disclosure Committee Meetings</u>	Correspondence and supporting documentation with conclusions on need to disclose an event or financial transaction that could have an impact on financial results, condition or liquidity.	MAX3	7	Investor Relations; Corporate Acct;	F&A4000
<u>Disposed Records</u>	Record that provides evidence of the disposal of records (disposed date, record type/name, etc.) including audit trails.	MAX3	10	Official Record Holder;	BUS2015
<u>Distribution Records - Other</u>	Records detailing the finish product and raw material lot numbers corresponding to shipment records for recall purposes not affected by Food Drug & Cosmetic Acts or international equivalent.	MAX1	2	Product Supply;	PSO3015
<u>Distribution Records - Regulated</u>	Records detailing the finish product and raw material lot numbers corresponding to shipment records for recall purposes affected by Food Drug & Cosmetic Acts or international equivalent.	MAX3	6	Product Supply;	PSO3010
<u>Distributor Price Calculation</u>	Review Country Hold List before disposal. Records documenting the calculation of the distributor price from the regional entrepreneur to the distributor.	MAX3	CNTRY	Corporate Acct;	F&A4010
<u>Diversity Supplier Record</u>	Records involving the policy, assessment, approved list and award of contract to diversity designated supplies / contractors.	MAX3	6	Purchasing;	BUS2030
<u>ESOP2 / ESOP1 Records</u>	Records of the analysis and planning on how to implement and administer the Employee Stock Ownership Plan. ACT = until plan is implemented	ACT+3	ACT+6	Global Pensions;	HUM5050
<u>Electronic Way Bill - India</u>	Shipping record created for the carrier to transport the goods and confirms the point to point movement of the goods reflected in the invoice and related taxes.	MAX3	6	Product Supply;	F&A9080

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Electronic Way Bill - Turkey</u>	Shipping record created for the carrier to transport the goods and confirms the point to point movement of the goods reflected in the invoice and related taxes.	MAX3	10	Product Supply;	F&A9085
<u>Employee Data File</u>	Master Data file kept in SAP. Includes the entire individual's current information i.e. name, address, phone number, dependents, employee number, tax ID, etc. Certain information may be deleted after employment when no longer needed.	MAX3	75	ES Master Data;	HUM3000
<u>Employee Disciplinary Actions - Canada</u>	Records detailing performance correction and disciplinary actions including demotion. ACT = Life of employment	MAX3	ACT+15	Human Resource;	HUM6020
<u>Employee Diversity Reporting</u>	Report of company ethnic / minority diversity of the company required for government filing and contracts. Includes EE01 and Vets report form. ACT = until superseded	MAX3	ACT+6	Human Resource;	HUM4060
<u>Employee Register - Switzerland</u>	Register of company employee demographics/diversity, hire/termination dates and payroll information. ACT = register is no longer valid	MAX3	ACT+5	Human Resource;	HUM4065

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Employment</u>	<p>Records created during and after employment. Examples include non-USA disciplinary issues and actions, relocation file (includes authorization & financial calculations, census report), promotions (includes candidates & evaluations), ERISA notices, health care continuation (COBRA or international equivalent) notices after termination.</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E011, (Employee Tax & Social Security Support), E016, (Employee Relocation - Domestic/International), E530, (Schooling).</p>	MAX1	6	Human Resource; Health Services; Benefits;	HUM1007
<u>Employment Application</u>	<p>Candidate's application for employment and any records generated during the hiring process. File may include but not limited to job application, interview data, assessment selection data, test results, co-op records, drug screen, health screener (PPHQ's), education verification, etc. Retention time count begins with Decision date (to hire/not hire).</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; Scope E010, (Recruiting).</p>	MAX1	3	Human Resource; Health Services;	HUM2015

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Employment Record - Russia</u>	Records of an employee's work period. Includes but not limited to employment contract, employee profile information, work card, salary statements, earning record (T-2, T-54 form), social and pension payments, hiring transfers and separation documents. - Upon termination, forward to Central area Designated for your area.	MAX3	75	Human Resource;	HUM6035
<u>Employment Separation Package</u>	Review Country Hold List before disposal. Records related to employee and executive separation agreement from the company or an acquired company. Includes individual's separation / compensation package, contract, signatures, financial terms and conditions. To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E008, (Separation Package).	MAX3	CNTRY	Human Resource; ES Exec Compensation;	HUM5020
<u>Equipment & Parts Database</u>	Records detailing specifications and inventories of available parts and assemblies. ACT = while part in use in P&G	MAXACT	ACT	Site Safety;	ENG1000
<u>Equipment Records - Other</u>	Equipment manuals (including utilities) warranties, drawings, vendor verification, qualification for non GMP (Good Manufacturing Practice) Product Supply / Product Development sites. ACT = life of equipment	MAXACT	ACT	Maintenance Dept; Site Operations;	ENG1050

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Equipment Records - PS & R&D</u>	Manuals, warranties, vendor verification, drawings, and validation records for GMP (Good Manufacturing Practice) product making, packing, laboratory or utility equipment and instruments. ACT = life of equipment	MAXACT	ACT+6	Maintenance Dept; Equipment Owner; Site Operations;	ENG1060
<u>Equipment/Site Management - Other</u>	Environment monitoring and equipment (including utilities) maintenance records for non GMP (Good Manufacturing Practice) Product Supply / Product Development sites. Includes but not limited to repairs, preventative maintenance, calibration, temperature / humidity charts, pest control, water and waste removal.	MAX1	3	Maintenance Dept; Site Operations;	ENG2020
<u>Equipment/Site Management - PS & R&D</u>	Environment monitoring and equipment maintenance records for GMP (Good Manufacturing Practice) product making, packing, laboratory, utility equipment or instruments. Includes but not limited to repairs, preventative maintenance, cleaning, calibration, temperature / humidity charts, pest control, water and waste removal.	MAX3	6	Maintenance Dept; Site Operations;	ENG2010
<u>Equity Positions</u>	ILM review process. Records, certificates, deposits and payments that document P&G's position in another company. Review and disposal of Official records retained in centralized corporate systems (e.g., SAP G4P) follow the ILM process. ACT = until equity is sold	MAX3	ACT+CNTRY	Capital Markets; Financial Serv;	F&A6010

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Events/Speeches & Presentations</u>	Communications (audio / visual / script) and records of speeches, presentations and publications related to marketing, promoting and supporting the company image and activities in the marketplace or community that may have historical value. If record is kept in electronic record system, check with Corporate Archives before purging.	MAX3	MAX3+CA	Creating Dept; Investor Relations; Corp Communications; Global Sustainability;	BUS2045
<u>Excess Liability Policies</u>	Records and supporting documentation related to insurance coverage for problems manifesting themselves long after the policy terminates. LOCE = life of corporation/entity	MAXACT	LOCE+10	Insurance;	LEG2080
<u>Executive Communications</u>	Communications from company executives on corporate news, events, strategy and perspectives, etc. If record is kept in electronic record system, check with Corporate Archives before purging.	MAX3	MAX3+CA	Corp Communications;	EXR1050
<u>Export / Import Files</u>	ILM review process. Records and documentation to support export / import shipment and customs. May include: P&G sales order, shipping papers, invoicing, certificate of origin & analysis, packing material certification, hazardous chemical information, documentation of Federal Drug Admin (FDA) quotas, visa, Federal Communications Commission (FCC), or international equivalent, etc. Review and disposal of Official records retained in centralized corporate systems (e.g., SAP *5P, *6P, *7P, ANP) follow the ILM process.	MAX3	CNTRY	Cust Serv & Logistics;	CSL1070

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>External Relation Issues</u>	Records about a subject which may be a threat to the company's business if not handled appropriately. It can be emerging, in crisis, or resolved. ACT = while subject is open, if record is kept in electronic record system, check with Corporate Archives before purging	MAX3	ACT+3+CA	Corp Communications; Global Sustainability;	EXR1070
<u>Fact Sheet</u>	External Document provided to stakeholder which outlines key information and/or facts. ACT = until superseded, if record is kept in electronic record system, check with Corporate Archives before purging.	MAX3	ACT+3+CA	Investor Relations; Corp Communications; Global Sustainability;	EXR1040
<u>Financial Reporting Data</u>	ILM review process. Records from the consolidation of financial statements from all the company financial systems. Includes summary level balance sheet, cash flow, earnings and P/L. Used as the official financial reporting communication for the company. Excludes GL/Sub-ledger reports. Review and disposal of Official records retained in centralized corporate systems (e.g., SAP GSP) follow the ILM process.	MAX3	CNTRY	Corporate Acct; Financial Serv;	F&A6070
<u>Financial Statements</u>	US GAAP & local GAAP Profit / Loss and Balance sheet for the year and Majors and SPED / FCON data required by Brazil.	MAX10	100	Tax; Financial Serv;	F&A6080
<u>Flight Logs</u>	Paper logs of aircraft operating hours per flight. Cumulative record is maintained in another system.	MAX1	5	Airplane Ops;	BUS8060
<u>Flight Scheduler</u>	Documents individual flights including passengers, charges, destinations, etc.	MAX3	10	Airplane Ops;	BUS8070
<u>Foreign Exchange Rates & Data</u>	Records and data on foreign currency exchange rates and exposure used in the firm and fiscal forecasts and hedge risk updates.	MAX1	5	FX/Com;	F&A6050

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Formula Card</u>	Contains the product formula and may contain sampling information, testing requirements, limits, etc.	MAX10	75	Standards Office;	R&D2090
<u>Freedom to Practice</u>	Advice from legal team on risks of practicing a design change to a product for shipment to trade.	MAX5	26	Patent;	LEG1075
<u>Fuel Slips</u>	Records of airplane fuel and oil service.	MAX1	2	Airplane Ops;	BUS8080
<u>General Manager Reports</u>	Monthly reports written by General Managers to the CEO. If record is kept in electronic record system, check with Corporate Archives before purging.	MAX3	MAX3+CA	Corporate Archives;	BUS9000
<u>Government Fund - Brazil</u>	Records of payments to government managed fund for employees.	MAX1	30	HR Serv & Solutions;	F&A9060
<u>Government Surveys</u>	Surveys conducted by government agencies to secure data for summary purposes. Example: Dept. of Commerce form BE11.	MAX3	3	Corporate Acct;	BUS7085
<u>Hazardous Waste / Dangerous Goods Shipment Records</u>	Records related to the shipment of hazardous substances including manifests, Bills of Lading (BOL), and reporting records. Includes Canada Dangerous Goods Shipments.	MAX1	3	Shipping Office; Site HSE;	HSE1050
<u>Hazardous Waste Shipment Records - Australia</u>	Records related to the shipment of hazardous substances including manifests, Bills of Lading (BOL), and reporting records.	MAX1	5	Shipping Office; Site Operations;	HSE1067
<u>Hazardous Waste Shipment Records - France</u>	Records related to the shipment of hazardous substances in France including manifests, Bills of Lading (BOL), and reporting records.	MAX1	5	Shipping Office; Site HSE;	HSE1065
<u>Hazardous Waste Shipment Records - Italy</u>	Records related to the shipment of hazardous substances in Italy including manifests, Bills of Lading (BOL), and reporting records.	MAX1	5	Shipping Office; Site HSE;	HSE2090

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Hazardous Waste Shipment Records - Mexico</u>	Records related to the shipment of hazardous substances including manifests, Bills of Lading (BOL), and reporting records.	MAX3	10	Shipping Office; Site HSE;	HSE1056
<u>Hazardous Waste Shipment Records - Netherlands</u>	Records related to the shipment of hazardous substances including manifests, Bills of Lading (BOL), and reporting records.	MAX1	5	Shipping Office; Site HSE;	HSE1069
<u>Hazardous Waste Shipment Records - Saudi Arabia</u>	Records related to the shipment of hazardous substances in Saudi Arabia including manifests, Bills of Lading (BOL), and reporting records.	MAX1	5	Shipping Office; Site HSE;	HSE1058
<u>Hazmat Shipment Training</u>	Training materials and tracking to support regulated transportation criteria. ACT = period of certification	MAX1	ACT+3	Site HSE;	HSE1060
<u>Hedge Forecasts - Month - to - Month</u>	Change in the value of both expired and outstanding hedge contracts for the current fiscal year.	MAX1	2	FX/Com;	F&A7090
<u>I/C TSA SLA Contracts</u>	Review Country Hold List before disposal. Intercompany contracts, Transitional Service Agreements and Service Level Agreements between P&G Legal Entities, functions, Joint Ventures and post-divestiture third parties that govern goods or services provided under P&G's business model for a fee. Examples include, but are not limited to the following services: tolling, contract manufacturing, distributing, commissionaire services, R&D, GBS services, global or regional centralized services, etc. ACT = life of contract	MAX3	ACT+CNTRY	Contract Owner;	LEG4075

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>IP Strategy Documents</u>	Records submitted to SMART IP for patent drafting and prosecution purposes. ACT = life of patent	MAX5	ACT+6	R&D; Patent;	LEG1040
<u>Incorporation & Bylaws</u>	After active period, review Country Hold List before disposal. Articles & Certificates detailing the terms and conditions under which a corporation is formed and organized including its bylaws. LOCE = life of corporation/entity	MAX5	LOCE+CNTRY	Legal;	LEG1000
<u>Information Release Request</u>	Employee requests for the release of company information. Includes authorization release form and investigative consumer report release form. ACT = until request is completed	MAX3	ACT+6	Human Resource;	HUM1005
<u>Information Search Reports</u>	Results of an information search conducted on electronic, print or other information resources along with accompanying references, analysis, summaries, tables, cited documented and related materials.	MAX3	MAX10	Information Research Serv;	BUS3000
<u>Infrastructure Records - IT</u>	Records detailing trunking, networks, devices, applications for tracking, servicing, maintenance, billing, and ownership. ACT = Retention begins after device, operation or service is no longer used. To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com , E014 (IT Support, IT Asset Management, and IT Invoicing Business Processes), Scope E630 (IT Mobility).	MAX3	ACT+MAX3	System Owner;	BUS3010

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Inquiry / Dead Files</u>	Records and supporting documentation detailing outside inquiries for new business opportunities.	MAX1	5	Acquisitions & Divest; Equity Ventures;	F&A1010
<u>Inspections - Pre and Post Flight</u>	Notations of plane's visual inspections just prior to and immediately following usage.	MAX30D	30D	Airplane Ops;	BUS8090
<u>Insurance / Liability Policies</u>	<p>Policies and supporting documentation related to insurance and liability coverage. Includes, international liability & property, global cargo, US property, directors & officers liability and product recall.</p> <p>ACT = until superseded</p>	MAXACT	ACT+6	Insurance;	LEG3010
<u>Insurance Claims</u>	<p>Records related to possible or pending insurance claims. Example: Property, global cargo, product recall, director & officers. File is reduced to complaint / filing, resolution / judgement, and proof of compliance (if required by settlement), once resolved.</p> <p>ACT = while claim is open</p>	ACT+5	ACT+10	Legal; Insurance;	LEG3000
<u>Internal Assessment</u>	<p>Analysis and reports of internal services, facilities, various support capabilities, applications, Intranet sites, employees (in groups) and /or gathering of requirements. Information gathered by various means such as data tracking, feedback and surveys.</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E021 (Employee Surveys), E027 (HR Analytics), E028 (Application Performance Analysis).</p>	MAX5	MAX5	Owning Dept; Survey Owner;	BUS6060

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Internal Counsel</u>	Records detailing the process the company should follow in a particular event or issue.	MAX3	MAX3	Investor Relations; Corp Communications;	EXR1060
<u>Inventory Accounting - AWI</u>	Review Country Hold List before disposal. Records documenting the value of purchases, adjustments and reduction of materials that support the Average Weighted Inventory (AWI) cost required for local statutory purposes in various markets.	MAX3	CNTRY	Financial Serv;	F&A1070
<u>Inventory Accounting - LIFO</u>	ILM review process. Records documenting the yearly value of purchases, adjustments and reduction of materials against the baseline LIFO inventory. See Standards for Accounting and Financial Excellence (SAFE) for active LIFO pools. Review and disposal of Official records retained in centralized corporate systems (e.g., SAP KCI, N6P) follow the ILM process. ACT = while a P&G legal entity and/or brand is actively applying LIFO.	MAX3	ACT+CNTRY	Tax; Financial Serv;	F&A2005
<u>Investment / Asset Manager</u>	Records detailing the performance, yields, dollars, etc. of P&G's investment and asset managers. ACT = until fund is liquidated	ACT+3	ACT+6	Global Pensions;	HUM1015
<u>Investment Fund - Poland</u>	Records detailing the performance and management of funds (i.e. Occupational). ACT = until fund is liquidated	MAX3	ACT+50	Global Pensions;	HUM1020

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Invoices & Expense Rpt.</u>	<p>ILM review process. 3rd party & IC sales & purchase invoices, credit notes, employee expense reports and supporting documents. Includes tax invoices & official receipts required in certain countries (e.g. Brazil [NFE's], Thailand, Philippines, etc.). Excludes invoices for Capital Asset Records (F&A2040). Review and disposal of Official records retained in centralized corporate systems (e.g., SAP K5P, Vault, LDA, eCARM), systems maintained by 3rd parties (e.g. Trustweaver, GERS), as well as hard copies, follow the ILM process.</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E012 (Corporate Credit Cards and Travel Expense Accounting), E190 (Company Shop Payment), E200 (Dining Services).</p>	MAX3	CNTRY	Financial Serv; HR Serv & Solutions; Cust Serv Org;	F&A2071
<u>Journal Entries Baseline</u>	Records (General Journal Entries and Journal Entries) documenting the creation of the baseline accounting calculations from fiscal year ending 1954 that are used for future tax computations.	MAX3	100	Tax;	F&A1095
<u>Labeling Files</u>	Labeling committee meeting records, relevant supporting documentation and files.	MAXACT	5	R&D;	R&D3050
<u>Labor Relations</u>	<p>Records related to relations between the company, labor unions and/or employees including contracts and meeting minutes.</p> <p>ACT = until contract/agreement is superseded</p>	ACT	ACT+6	Site Human Resource;	HUM7000
<u>Labor Tracking - Brazil</u>	Records of hours worked, vacation, etc. for employees and 3rd party workers.	MAX1	5	HR Serv & Solutions;	HUM7010

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Labor Tracking - Czech Republic</u>	Time and attendance record of hours worked, vacation, sickness, etc. for employees.	MAX1	10	HR Serv & Solutions;	HUM1025
<u>Labor Tracking - Indonesia</u>	Time and attendance records of hours worked, vacation, etc. for employees.	MAX1	5	HR Serv & Solutions;	HUM1030
<u>Labor Tracking - Spain</u>	Time and attendance records of hours worked, vacation, etc. for employees.	MAX1	4	HR Serv & Solutions;	HUM7012
<u>Labor Tracking - Turkey</u>	Time and attendance records of hours worked, vacation, etc. for employees.	MAX3	10	HR Serv & Solutions;	HUM1010
<u>Learning Transcript</u>	<p>List of training courses completed by an employee, including but not limited to, course title, date/time of completion, completion status, and credit hours.</p> <p>ACT = life of employment</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E470 (Employee - External/Internal/Strategic/Function Training Course).</p>	MAX1	ACT+6	HR Global Training;	HUM6090
<u>Litigation/Claims</u>	<p>Records related to threatened or pending litigation or other legal action, including internally and externally generated work product. For all litigation including, but not limited to, product, intellectual property, commercial grievances, advertising claims, etc.</p> <p>ACT = date of final judgment or resolution. All other records will then be governed by original Retention Limit EXCEPTION: Suits/claims involving children - retain until child is 21 + 1 year.</p>	ACT	ACT+10	Legal;	LEG1095

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Lobbying Records</u>	Records used to certify that forms were submitted for executive and legislative lobbying activities. Includes forms and certification.	MAX3	MAX10	Govt Relations;	EXT3090
<u>MSDS - Non REACH</u>	P&G and vendor Material Safety Data Sheets for countries that do not follow the EU requirements. ACT = until superseded or no longer produced	MAXACT	ACT+3	Site HSE;	HSE2020
<u>MSDS - REACH</u>	P&G and vendor Material Safety Data Sheets for countries following the EU requirements. ACT = until superseded or no longer produced	MAXACT	ACT+10	Site HSE;	HSE1080
<u>Make & Pack Process Development</u>	Documents the development of a manufacturing / packaging process (Knowledge Package) which is given to Product Supply when finalized. Includes transformation and process flow sheets & diagrams that show the process, ingredients and systems to make and pack, centerline worksheet, manufacturing and packaging standards, process development records, capability data, reports, etc.	MAX3	10	R&D;	R&D3080
<u>Management Reports - Local Share</u>	Records reporting market place performance, i.e. monetary sale figures, share of market.	MAX10	30	Market Measurements;	MKG4040
<u>Management Reports - Point of Sale</u>	Records reporting SKU by store for a specified period of time. Examples include New Initiative Tracking, Out of Stocks, New Business tracking. ACT = until superseded	MAXACT	ACT	GBU;	MKG2040

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Management Reports - Product Initiative & Knowledge Papers</u>	Records created to provide product initiative data to management, e.g. record of the forecast and/or actual performance of launched and cancelled initiative.	MAX3	50	GBU; CMK;	MKG2050
<u>Management Reports - Trends</u>	Reports showing trends / measurements regarding marketing, products, consumers and customers. Includes but not limited to market share and/or size estimates, product shipments, consumer responses, demographics, customer volume, etc.	MAX10	10	Report Owner;	MKG2060
<u>Marketing - Annual Business Review</u>	Documentation of key issues and opportunities from the annual review. Includes share volume, NOS, profit analysis, customer DPSM (distribution, pricing, shelving, merchandising - in store condition measures), consumer fundamentals (trial and loyalty analysis), etc. If record is kept in electronic record system, check with Corporate Archives before purging.	MAX10	3CA	Corporate Archives; Marketing;	MKG4020
<u>Marketing Promotion Files</u>	Records summarizing promotions i.e. contests / sweepstakes, coupons / refund offers. Includes records from inception through design & execution (i.e. originating document, contracts, verification of receipt documents, winners list, samples of final execution , summary report on results). ACT = life of promotion	MAX3	ACT+6	Marketing Operations;	MKG2070

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Master Data</u>	<p>Master data tables for customer, vendor, product, materials, pricing and P&G information in global SAP G11 and regional (e.g. N6P, etc.) databases. Data feeds into local applications to create transactional and operational records and reports. Includes Product GPDB, Material GMDB, Supplier GSDB, Customer GCDB, Price & Promotions GPPDB, Enterprise GEDB and Organization GORDB. Global Trade Identification Numbers (GTIN/UPC) are reused.</p> <p>ACT = Data is superseded or no longer used</p>	ACT+MAX1	ACT+3	Master Data Mgmt;	BUS3035
<u>Material Development Records</u>	Documents the development of material in scale up that will be used in a new or existing product with material supplier information. May include description, learning plan, scale-up data, vendor qualification, supplier forecast, purchase orders, supplier contacts, etc.	MAX3	6	R&D;	R&D4030
<u>Material/Packing Specifications</u>	<p>Documents that provides the specifications for raw material development and packaging materials. Documents include the master (MPMS), (MPS) & individual (IPMS), (IPS) specifications, individual raw material specifications (IRMS) and the authorized template standard (ATS) for raw and packaging material definition. Provides the details/instructions for the raw material and packaging components or assemblies for each SKU.</p> <p>ACT = until superseded, if record is kept in electronic record system, check with Corporate Archives before purging</p>	MAXACT	ACT+20+CA	Standards Office;	PSO3000

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Media - Marketing Knowledge Papers</u>	Records related to internal and external marketing media research studies. Includes study methods, results and research data analysis, summaries and key learning reports. Also includes externally generated reports relevant to media - marketing research i.e. reports found in publications, subscriptions, newspaper articles, books, etc. ACT = while in use	MAXACT	MAXACT	Media Dept;	MKG4030
<u>Media Communications</u>	Records related to short news releases, addressed reactively toward the media in reaction to a media inquiry. Includes background information and company position. If record is kept in electronic record system, check with Corporate Archives before purging.	MAX3	3CA	Corp Communications; Global Sustainability;	EXR2010
<u>Medical File</u>	Records on employees / interns. Medical status may include initial screening, personal information, surveillance forms, risk profile, annual examination test results, ergonomics data, x-rays, injury treatment, authorizations for release, material safety data sheet (MSDS), personal exposure data, return to work clearance, relevant disability data, medical leave, certification, etc. ACT = until employee leaves / retires from the company To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E004 (Medical Occupational Health and Safety Business Process).	MAX1	ACT+30	Health Services;	HUM4010

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Medical File - EU</u>	<p>Records on employees / interns. Medical status may include initial screening, personal information, surveillance forms, risk profile, annual examination test results, ergonomics data, x-rays, injury treatment, authorizations for release, material safety data sheet (MSDS), personal exposure data, return to work clearance, relevant data, certification, etc.</p> <p>ACT = until employee leaves / retires from the company</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E004 (Medical Occupational Health and Safety Business Process).</p>	MAX1	ACT+40	Health Services;	HUM6040
<u>Medical File - France</u>	<p>Records on employees / interns. Medical status may include initial screening, personal information, surveillance forms, risk profile, annual examination test results, ergonomics data, x-rays, injury treatment, authorizations for release, material safety data sheet (MSDS), personal exposure data, return to work clearance, relevant data, certification, etc.</p> <p>ACT = until employee leaves / retires from the company</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E004 (Medical Occupational Health and Safety Business Process).</p>	MAX1	ACT+50	Health Services;	HUM6045

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Medical Presentations</u>	Scripts of presentations and seminars for sales force, medical symposium, physician leads, etc. ACT = until superseded	ACT+MAX3	ACT+5	Medical Affairs;	BUS8000
<u>Message Track</u>	Records created internally to ensure consistent delivery of message. ACT = until superseded, if record is kept in electronic record system, check with Corporate Archives before purging	MAX3	ACT+3+CA	Investor Relations; Corp Communications; Global Sustainability;	EXR2030
<u>Modeling & Simulation</u>	Modeling and simulation design and tests (3D/2D) on product design, packaging and production equipment for a product initiative. Includes but not limited to solutions on liquid packaging (Bottles), assembled packaging (Boxes, Blisters, Foam, etc) material (excluding artwork), mold drawings, prototypes, product component stress tests, product design, manufacturing and packaging equipment. ACT = until product development is completed/closed	MAXACT	ACT+5	R&D;	R&D4010
<u>Month-End / Quarter-End Close</u>	Records related to accounting month-end / quarter-end reconciliation and reporting including supporting documentation and transactions.	MAX1	2	Acct & Fin Rpt;	F&A2045
<u>Monthly Activities Statements</u>	Records used to confirm the monthly investment activities of investment companies and money managers used by P&G. ACT = until superseded	ACT+3	ACT+6	Global Pensions;	HUM4005

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>News / Features</u>	Records detailing internal information that may be of interest or serve as a reapplication model across the entire External Relations organization. If record is kept in electronic record system, check with Corporate Archives before purging.	MAX1	3CA	Corp Communications; Global Sustainability;	EXR2040
<u>Noise Safety Program - Canada</u>	Records of investigation on employee exposure to noise against regulatory standards. May include site noise exposure testing, exposed worker information, test results, preventive/corrective actions as needed, recommendations on use of hearing protectors, etc.	MAX3	10	Site HSE;	HSE3080
<u>Noise Safety Program - Germany</u>	Records of periodic testing on a site's noise levels against regulatory standards. May include site noise level tests, exposed worker information, test results, preventive/corrective actions as needed.	MAX3	30	Site HSE;	HSE3060
<u>Noise Safety Program - Portugal</u>	Records of periodic testing on a site's noise levels against regulatory standards. May include site noise level tests, exposed worker information, test results, preventive/corrective actions as needed.	MAX3	30	Site HSE;	HSE3070
<u>Offering Memorandum (OM) Library</u>	Collection of historic offering memorandum produced by the company. OM's are detailed records providing historic and forward looking information on a business or brand.	MAX3	MAX20	Acquisitions & Divest;	BUS3090

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Open Job Posting</u>	Records generated in the course of the selection process for internal assignment transfers. Includes job description, applications, interviews, decision and other records created in the course of the hiring. To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E010, (Recruiting).	MAX3	3	Human Resource;	HUM1055
<u>Open Job Posting - Portugal</u>	Documents the job vacancies, their announcements, lists of candidates and information on the recruiting process. To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E010, (Recruiting).	MAX1	5	Human Resource;	HUM6050
<u>Operation - Air Permit</u>	Records relating to air permits, monitoring and reporting. ACT = term of permit	MAXACT	ACT+5	Site HSE; Site Operations;	HSE1090
<u>Operation - Air Permit - Australia</u>	Records relating to air permits, monitoring and reporting.	MAX3	7	Site HSE; Site Operations;	HSE2032
<u>Operation - Air Permit - Canada</u>	Records relating to air permits, monitoring and reporting. ACT = report's submitted date	MAXACT	ACT+7	Site HSE; Site Operations;	HSE2030
<u>Operation - Air Register - Malaysia</u>	Register of all air impurity emission test results in required facilities. ACT = life of building	MAXACT	ACT+5	Site HSE; Site Operations;	HSE3040

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Operation - Permits/License</u>	<p>Documentation, records and posting related to the operation and/or operators of equipment which requires permits or operator's licensing by local, state or federal agencies. (i.e. boilers, pressure vessels, elevators, zoning, water, environmental, building occupancy and risk permits.</p> <p>ACT = term of permit/license</p>	MAXACT	ACT+3	Site HSE; Site Operations;	HSE2000
<u>Operational Records</u>	<p>Records relating to department/functional operations and general administrative documents. Includes but not limited to calendar, meeting schedules / notes, presentations, monthly activity reports, vacation schedules, scorecards, call center records, action plans, Service Level Agreement (SLA) without charges, signature requests, non-ROA approvals, distribution lists, newspaper ads, vendor assessments, data change forms, requests for company information, organization charts, packing slips/receipt, customer communication & information forms, 3rd Party subpoena response, stop payment requests, retail service work order, transmittal documents, unsuccessful copyright/trademarks, foreign exchange reports.</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E006 (Travel), E023 (Organization charts), E026 (External Audits, Legal Matters & Legal Consultancy), E029 (HR Case Management (Employee Care), E101 (Time & Attendance), E180 (Other Site Services (Fitness/Dry</p>	MAX3	MAX3	Owning Dept;	BUS4000

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
	Cleaning/Salons/Networks/Uniforms), E220 (Flower Services), E240 (Postal Services), E365 (Employee - Communications), E366 (Ordinary Work Related Activities), E430 (Holiday Gift), E480 (Corporate Events/Meeting Planning/ P&G Sponsored Events), E510 (Charitable Contributions), E570 (Trade Union Membership), E710 (Executive Travel and Security), C010 (Sampling on P&G Online Properties), C026 (Corporate Opt Out Management), C029 (Custom Audiences), C034 (Consumer Data External Audits, Consumer Subject Right Requests, Legal Matters & Legal Consultancy), C035 (DTC- Sales Attribution).				
<u>Optimal Hedge Bid Sheets</u>	Records detailing what banks won / lost on option or forward. ACT = until superseded	MAXACT	ACT+1	FX/Com;	F&A2075
<u>Organizational Data</u>	Database of information about the use and occupation of facilities by dept / space / building. ACT = until superseded	MAXACT	ACT+6	Site Operations; Site Engineering;	ENG1080
<u>P&G Fund Files</u>	Records relating to contributions made by the P&G fund to non-profit organizations.	MAX5	MAX20	Community Relations;	EXR2035
<u>P&G Images</u>	Company and brand logo's and photos that are used to promote the P&G corporate brand or to illustrate a company product, brand name, symbol or trademark. ACT = until superseded, if record is kept in electronic record system, check with Corporate Archives before purging	MAXACT	ACT+CA	Corp Communications; GBU;	EXR3070

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>P&G Product Price Lists</u>	Base P&G product price lists and order guides offered for sale.	MAX3	4	Sales Operations;	MKG2090
<u>PV Data - Canada - Device</u>	Global Product vigilance data from solicited and unsolicited sources on marketed medical devices in Canada. Information includes but not limited to adverse event/reactions, data used for monitoring and reporting events, including results of literature searches, periodic safety reports, data sent to a regulatory authority e.g. US FDA (Food & Drug Administration or its international equivalent).	MAX1	7	Gbl Prod Stwdshp;	R&D1000
<u>PV Data - Canada - Medicines</u>	Pharmacovigilance data from solicited and unsolicited sources on marketed medicinal products required to carry a Drug Identification Number (DIN) by Health Canada. Information includes but not limited to adverse event/reactions, data used for monitoring and reporting events, including results of literature searches, periodic safety reports, data sent to a regulatory authority e.g. US FDA (Food & Drug Administration or its international equivalent).	MAX5	25	Gbl Prod Stwdshp;	R&D2015
<u>PV Data - EU Medicines</u>	Pharmacovigilance data from solicited and unsolicited sources on medicinal products granted a Marketing Authorization (MA). Information includes but not limited to adverse event/reactions, data used for monitoring and reporting events, including results of literature searches, periodic safety reports, data sent to the EU EudraVigilance database or other regulatory authorities, etc. ACT = until product's marketing authorization is closed/canceled	MAX3	ACT+10	Central Records; Gbl Prod Stwdshp;	R&D2010

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>PV Data - Global</u>	Health-related complaint records not otherwise defined, including those used in Clinical & Consumer Studies. Includes but is not limited to adverse events/reactions, data used for monitoring and/or preparing summary reports, and supporting literature searches, and periodic safety reports.	MAX1	6	Gbl Prod Stwdshp;	R&D6075
<u>PV Data - Japan</u>	Pharmacovigilance and Cosmetovigilance data from solicited and unsolicited sources on cosmetics and quasi drug products. Includes but not limited to, Cosmetic serious/non-serious event/reactions, data for monitoring and reporting, literature searches, periodic safety reports, etc. Quasi-drugs adverse event/reactions, data for monitoring and reporting events, literature searches, periodic safety reports, etc. ACT = active until cancellation of product registration	MAX1	ACT+5	Gbl Prod Stwdshp;	R&D6085

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>PV Master File - EU</u>	<p>Master record of compiled information on the pharmacovigilance system which is updated as needed. Includes, but not limited to, information on the qualified person responsible for pharmacovigilance, their responsibilities, curriculum vitae summary and back up when absent. Org structure showing where PV activities take place, description of data handling and recording of activities, summary of pharmacovigilance training concept, location of training records, list of sub contractors and their locations, list of medicinal products covered, list of policies & procedures, notes on when and who updated the master file.</p> <p>ACT = until product's marketing authorization is closed/cancelled</p>	MAX3	ACT+5	PS&RA;	R&D1001
<u>Packaging Sizing Models</u>	<p>Calculation models used in designing packing materials.</p> <p>ACT = until superseded</p>	MAXACT	ACT+3	R&D;	R&D4050
<u>Packing Standards</u>	<p>Contains all package elements for a given Finished Product (SKU). Lists pack materials, assembly instructions, trade weights & dimensions and approved countries for sale.</p> <p>ACT = until superseded</p>	MAXACT	ACT+6	Standards Office;	PSO3005
<u>Pander Files</u>	<p>Records of consumers who want to be removed from consumer marketing database.</p> <p>ACT = until superseded</p>	MAXACT	ACT	Consumer Relations;	EXR2080

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Panelist Database</u>	<p>RETENTION TIME: Does not begin until the relationship with the panelist ends. Data given by consumers (age of child, shave/do not shave, age, hair color, skin information, etc.). Used to search and match panelist for potential tests that aligns to their data. Signed consumer test CDA's (Confidential Disclosure Agreement) are not included, see record series R&D1020 and R&D2000.</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E370 (Employee - R&D Clinical, concept & use tests).</p>	MAX1	MAX2	R&D;	R&D4080
<u>Patents</u>	<p>Records related to the preparation, filing, prosecution, maintenance, and rights. Includes PCT file, Development Record, opposition file, drawings, and the contents of the Application File (aka wrapper) which is reduced down to key documents if patent is granted.</p> <p>ACT = life of patent</p>	MAXACT	ACT+6	Patent;	LEG3035
<u>Patents - Abandoned Filings</u>	Application File (aka wrapper) for patents not granted, abandoned globally, or not pursued, including their Development Records.	MAX3	20	Patent;	LEG3045
<u>Patents - Ribbon Copy</u>	<p>Patent document received from a Patent Office after a patent had been granted.</p> <p>LOCE = life of corporation, entity or patent whichever is longer, if record is kept in electronic record system, check with Corporate Archives before purging</p>	MAXACT	LOCE+CA	Patent;	LEG3055

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Payroll</u>	<p>ILM review process. Records showing amount paid to employees and their adjustments due to tax, benefit choices, court orders, etc. Review and disposal of Official records retained in centralized corporate systems (e.g., SAP NP1) follow the ILM process.</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E100 (Payroll/Other Compensation & Social Security/Unemployment).</p>	MAX3	CNTRY	HR Serv & Solutions;	F&A2081
<u>Payroll Adjustments</u>	<p>Records generated by a court, employee or company adjusting an individual's pay. May include but not limited to stock, fitness center, loans (e.g. profit sharing trust), out of the ordinary payments (e.g. awards, loss of home) child support, tax lien, alimony, disability, maternity, workers compensation and adoption.</p> <p>ACT = until superseded / closed</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E018 (Employee - Service Awards and Power of You Recognition Programs), E440 (Vouchers), E560 (Military Service).</p>	MAXACT	ACT+3	Payroll; ES Center;	F&A3005

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Payroll Records - Romania</u>	<p>Signed monthly record that lists all employees and their base salary, overtime, bonus, benefits, income tax and other deductions that calculate their net salary. A copy is sent to the government's labor office.</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E100 (Payroll/Other Compensation & Social Security/Unemployment).</p>	MAX1	50	Human Resource;	F&A3027
<u>Performance Awards</u>	<p>Review Country Hold List before disposal. STAR (Short Term Achievement Reward), LTIP (Long-Term Incentive Program), and Performance Stock Program (PSP) calculations with supporting documentation for specific management levels. Calculations are based on applicable Business Unit performance in combination with total company performance and can be taken as stock options with an expiration date or cash. Includes SEC filing w/attachments.</p> <p>ACT = until option term is met.</p>	MAX3	ACT+CNTRY	Corporate Finance;	F&A7025

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Personnel Files - All Others</u>	<p>Records related to specific employee data and performance. Includes application, resume, acknowledgement of employment, standard conduct files, etc., up to basis for terminating employment, voluntary retirement, and company initiated separations.</p> <p>- Upon termination, forward to Central area Designated for your area.</p> <p>ACT = life of employment</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; Scope E003 (Personnel Files/Work Permit/Life & Career/etc.).</p>	MAX3	ACT+6	Manager;	HUM3010
<u>Personnel Files - Australia</u>	<p>Records of an employee's work period. Includes but not limited to employment contract, employee profile information, hiring transfers, application, resume, and separation documents.</p> <p>- Upon termination, forward to Central area Designated for your area.</p> <p>ACT = life of employment</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; Scope E003 (Personnel Files/Work Permit/Life & Career/etc.).</p>	MAX3	ACT+7	Human Resource; Manager;	HUM6036

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Personnel Files - Canada</u>	<p>Records related to specific employee data and performance. Includes application, resume, acknowledgement of employment, standard conduct files, etc., up to basis for terminating employment, voluntary retirement, and company initiated separations.</p> <p>- Upon termination, forward to Central area Designated for your area.</p> <p>ACT = life of employment</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; Scope E003 (Personnel Files/Work Permit/Life & Career/etc.).</p>	MAX3	ACT+15	Human Resource; Manager;	HUM6030
<u>Personnel Files - Mexico</u>	<p>Records related to specific employee data and performance. Includes application, resume, acknowledgement of employment, standard conduct files, etc., up to basis for terminating employment, voluntary retirement, and company initiated separations.</p> <p>- Upon termination, forward to Central area Designated for your area.</p> <p>ACT = life of employment</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; Scope E003 (Personnel Files/Work Permit/Life & Career/etc.).</p>	MAX3	ACT+30	Human Resource; Manager;	HUM6031

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Personnel Files - Poland New</u>	<p>Records of employees hired on or after January 1, 2019 that are related to specific employee data and performance. Includes application, resume, acknowledgement of employment, standard conduct files, etc., up to basis for terminating employment, voluntary retirement, and company-initiated separations.</p> <p>- Upon termination, forward to Central area Designated for your area.</p> <p>ACT = life of employment</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; Scope E003 (Personnel Files/Work Permit/Life & Career/etc.).</p>	MAX3	ACT+10	Human Resource; Manager;	HUM4042
<u>Personnel Files - Poland Prior</u>	<p>Records of employees hired on or before December 31, 2018 that are related to specific employee data and performance. Includes application, resume, acknowledgement of employment, standard conduct files, etc., up to basis for terminating employment, voluntary retirement, and company-initiated separations.</p> <p>- Upon termination, forward to Central area Designated for your area.</p> <p>ACT = life of employment</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; Scope E003 (Personnel Files/Work Permit/Life & Career/etc.).</p>	MAX3	ACT+50	Human Resource; Manager;	HUM4038

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Personnel Files - USA - Ohio</u>	<p>Records related to specific employee data and performance. Includes application, resume, acknowledgement of employment, conduct, disciplinary actions and associated investigations/supporting documentation, etc., up to basis for terminating employment, voluntary retirement, and company initiated separations.</p> <p>- Upon termination, forward to Central area Designated for your area.</p> <p>ACT = live of employment</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; Scope E003 (Personnel Files/Work Permit/Life & Career/etc.).</p>	MAX3	ACT+6	Retirement Planning; Human Resource; Global Pensions; Manager;	HUM1035
<u>Personnel Files - USA - Other</u>	<p>Records related to specific employee data and performance. Includes application, resume, acknowledgement of employment, conduct, disciplinary actions and associated investigations/supporting documentation, etc., up to basis for terminating employment, voluntary retirement, and company initiated separations.</p> <p>- Upon termination, forward to Central area Designated for your area.</p> <p>ACT = life of employment</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; Scope E003 (Personnel Files/Work Permit/Life & Career/etc.).</p>	MAX3	ACT+3	Retirement Planning; Human Resource; Global Pensions; Manager;	HUM3015

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Plan - O - Grams</u>	Records detailing the suggested or implemented product shelving diagrams. ACT = until superseded	MAXACT	ACT+2	CBD Retail;	MKG3020
<u>Policy & Procedures - Employee & Medical</u>	Records and documentation outlining the design and features of all employee related processes including medical, payroll, compensation, benefits (insurance, pension, disability, health care, vesting criteria, vacation entitlement etc.) and correspondence. ACT = until superseded	MAXACT	ACT+6	Human Resource; ES Benefits; Medical;	BUS4040
<u>Policy & Procedures - Financial</u>	After active period, review Country Hold List before disposal. Records documenting the company approved methods, processes or directives for performing activities to ensure uniformity and compliance with company and legal requirements. e.g. Standards for Accounting and Financial Excellence (SAFE). ACT = until superseded	MAXACT	ACT+CNTRY	Corporate Acct;	BUS4050
<u>Policy & Procedures - OTC / Medical Devices</u>	Procedures, manuals and guides that document approved methods, processes or directives for performing activities to ensure uniformity (supporting GMP, GLP or GCP or international equivalent). Includes functional area or department level practices, Standard Operating Procedures (SOP), Current Best Approach (CBA), etc. ACT = until superseded	MAXACT	ACT+15	Central Records; Policy Owner;	BUS4060

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Policy & Procedures - Other</u>	Procedures, manuals and guides that document approved methods, processes or directives for performing activities, including systems management, to ensure uniformity. Includes functional area or department level practices, Standard Operating Procedures non-Drug (SOP), Current Best Approach (CBA), Smart Sharing, Job Safety Analysis (JSA), etc. ACT = until superseded	MAXACT	ACT+3	Policy Owner;	BUS4070
<u>Position Paper - P&G</u>	Records originated internally to explain company positions on an issue and educate persons handling external contacts / managing the issue at hand. Includes background information, company position, and Q&A's. Not shared publicly. ACT = until issue is no longer open, if record is kept in electronic record system, check with Corporate Archives before purging	MAX3	ACT+3+CA	Investor Relations; Corp Communications; Global Sustainability;	HUM2005
<u>Power of Attorney</u>	Review Country Hold List before disposal. Power of Attorneys (POAs) are contracts or agreements that authorize an individual to sign a legal document on behalf of a P&G legal entity regardless of any previous standing as a duly authorized representative. LOCE = Life of corporation/entity	MAX3	LOCE+CNTRY	Legal; Tax;	LEG4070
<u>Privileged Advice - General Matters</u>	Opinion letter and other outside legal / tax consultant advice on general matters (code provisions, legal entity structure, etc.).	MAXACT	100	Tax;	F&A3065

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Process Equipment Drawings</u>	Detailed drawings of processing equipment. Includes vendor certification, vendor / manufacturer correspondence, etc. ACT = life of equipment	ACT+3	ACT+10	Engineering;	ENG1090
<u>Process/Packaging Qualification</u>	Records and documentation related to the qualification of the operation and performance for lines that produce and pack non-regulated products. These include Input Qualification (IQ), Output Qualification (OQ) & Process Qualification (PQ) and change control. ACT = life of process	MAXACT	ACT+3	Product Supply; QA;	PSO1060
<u>Process/Packaging Validation - PS</u>	Evidence that the packaging operation and process (Input, Output, Process Qualification) is in compliance with P&G / Food & Drug Administration (FDA or international equivalent) specifications and regulations for lines that produce and pack regulated products. Includes change Control. ACT = life of process	MAXACT	ACT+6	Product Supply; R&D;	PSO1075
<u>Product & Packaging - Artwork Design</u>	Illustrations, technical specifications and drawings of product containers, labels and packaging materials artwork. ACT = until superseded, if record is kept in electronic record system, check with Corporate Archives before purging	MAX5	ACT+20+CA	Standards Office; Packaging Dev;	PSO1080

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Product & Packaging - Images</u>	Records that illustrate product, packaging and store display. May include photos, drawings, and computer generated illustrations of individual products, groups of product, special packs & bar code sheets. ACT = until image is superseded, if record is kept in electronic record system, check with Corporate Archives before purging	MAXACT	ACT+3+CA	CBD Retail; Marketing Operations;	MKG3030
<u>Product Appearance</u>	Shows how the product is to be viewed globally and regionally regarding logos, characters, etc. Provides information to P&G and advertising groups on what can or cannot be done to a product. Includes, Theme Boards, design rollouts, etc. ACT = until superseded	MAXACT	ACT+3	Design;	R&D5030
<u>Product Concept Designs</u>	Drawings on product concepts for future initiative. ACT = until concept is approved / closed	MAXACT	ACT	Design;	R&D5040
<u>Product Development</u>	Development & modification of products. Records may include consumer testing, proposals, initiative readiness, pre-clinical data, analytical data, toxicology, test methods, stability records, experimental orders, safety records, raw & compiled data, retained tested product samples, HPT/PRT reports, child resistance & adult suitability tests, reports, supply records, etc. Signed consumer test CDA's (Confidential Disclosure Agreement) are discarded after the tests are completed.	MAX5	25	Central Records; R&D;	R&D2000

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Product Drawing</u>	Approved drawing of a product's design and its components. ACT = until superseded	ACT+3	ACT+10	Design;	R&D5050
<u>Product File - Cosmetic - EU</u>	Product Information File and cosmetovigilance data for an EU registered cosmetic product. Includes but not limited to cosmetovigilance data from solicited and unsolicited sources and serious/non-serious event/reactions, information file which is updated with any change including description of product, safety report, manufacturing method, poof of any effect claim and any animal testing data. ACT = active until last cosmetic batch is manufactured	MAX1	ACT+10	Gbl Prod Stwdshp;	PSO3050
<u>Product File - Device</u>	EU Declaration of Conformity and technical documentation of a product that demonstrates the safety and performance of a medical device (i.e., STED, Technical Readiness, formal notifications to Notified Body with responses or approvals) and related changes. Includes description of product, intended use, design drawings, manufacturing method, diagrams of components and assembly, clinical evaluation, risk assessment, label, instructions for use, certifications. ACT = last device has been placed on market	MAX1	ACT+10	R&D; QA; Regulatory;	PSO3040

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Product Initiative & Events</u>	Qualitative product initiative materials such as SIMPL process documents, conceptual briefs, and strategy documents for initiative and events where product is produced and shipped. May include bases of interest, launch agreements, marketing plans, post mortem analysis, etc. ACT = until first shipment or cancelled	MAXACT	ACT+6	GBU; CMK;	MKG3055
<u>Product Initiative Information</u>	Records summarizing / supporting the introduction of an initiative externally. ACT = until initiative is closed / launched	MAX3	ACT+3	Corp Communications; Global Sustainability;	EXR2090
<u>Product Learning History</u>	Primary document that shows the evolution of a product. Lists the consumer tests what was learned from each one and incorporated in the product.	MAX3	10	R&D;	R&D5080
<u>Product One Page Issue Sheet</u>	Documents what direction is taken with a product and its changes. Contains opinions, rational for the decisions.	MAX3	10	R&D;	R&D5090
<u>Product Paths</u>	Records showing hierarchy of the companies brands / products. ACT = while product path is still in use by the company	MAXACT	ACT+5	Consumer Relations;	EXR3010
<u>Profit Forecast Reports - Detail</u>	Records with supporting documentation that include: Monthly forecast of expenses for profit centers that roll up to corporate divisions and, legal entity P/L forecast for accumulation profit centers. ACT = current fiscal year	MAXACT	ACT+1	Budget Analyst;	F&A3085

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Profit Forecast Reports - Summary</u>	Records with supporting documentation that include monthly / forecast of volume, revenue, expenses and cash flow by management business unit and geography that roll up to world wide forecast and actual management results.	MAX3	MAX20	Corporate Finance; Corporate Acct;	F&A3095
<u>Project Files - Business</u>	<p>Business project records including project initiation, spending, deployment plans, resource utilization, issue tracking, meeting notes, status reports with supporting documentation (e.g. SIMPL). Examples: salary plans, reorganization, application development, workflow redesign.</p> <p>ACT = until completed or cancelled</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E290 (Non-P&G Employees Temporary Labor/Staffing & Independent Contractor/Agents).</p>	MAX3	ACT+MAX3	Project Manager;	BUS4080

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Project Files - Capital / Financial</u>	<p>After active period, review Country Hold List before disposal. Records for capital and financial projects e.g., projects over \$100M, building expansion and new capital equipment that are maintained outside of GBP. File may include the Appropriation, Authorized Expenditures (AE), and Report of Authorization (ROA) with Recommendation of Charge (ROC), Engineering Change Notification (ECN), Project Change Authorization (PCN), project initiation, deployment plans, resource utilization, cross charge reporting, issue tracking, notes and status reports.</p> <p>ACT = until completed or cancelled</p>	MAX3	ACT+CNTRY	Project Manager; Financial Serv;	F&A4005
<u>Promotion Fund Management</u>	<p>Review Country Hold List before disposal. Records and documentation of transactions into and out of Promotion Fund Accounts. Includes fund contract, adjustments and transaction documents.</p>	MAX3	CNTRY	Cust Serv & Logistics;	CSL2000
<u>Promotion Offers Fulfillment File</u>	<p>Records documenting the processing of promotion offers from requests to shipment. Includes phone / mail in requests, offer certificates, proof of purchase (e.g. cash register receipt, UPC code, package, invoice, velocity report) qualification decision, shipment record and summary reports.</p> <p>ACT = until offer's final shipment date</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; C013 (Delivery of Requested Items/Fulfillment).</p>	MAXACT	ACT+90D	Marketing Operations;	MKG3090

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Promotional Claims - UK</u>	Records of promotional events, payments and resolution of claims for further payment. May include, event proposal, joint business plan, invoice, payments, claims and resolutions.	MAX3	6	Marketing Operations;	MKG4060
<u>Property VAT - Switzerland</u>	Value Added Tax transaction records on immovable property.	MAX5	20	Capital; Financial Serv;	F&A9070
<u>Prototype & Samples</u>	New product idea in the form of a sample/prototype (finished pad) or records of how it was created and not associated with test results. May include any molds, etc. used in creating the prototype. (For samples used in testing, see r/s Product Development, R&D2000)	MAX5	MAX5	R&D;	R&D6000
<u>Proxy File Preparation Documents</u>	Documents including the working papers in preparation for the annual report.	MAX1	5	Retirement Planning; Global Pensions; ES Exec Compensation;	LEG4050
<u>Publication Files</u>	Publication plan, communications which pertain to the publication of articles, published materials database and reports.	MAX3	10	R&D;	R&D6060
<u>Published Articles</u>	Copies of externally created and published articles about the company. Collected to produce a yearly summary of the best / worst for the board. If record is kept in electronic record system, check with Corporate Archives before purging.	MAX3	3CA	Corp Communications;	EXR3020
<u>Purchase Orders</u>	ILM review process. Records showing the ordering and acknowledgement of receiving goods and services. Excludes activity related to capital expenditures- see record series F&A2040. Review and disposal of Official records retained in centralized corporate systems (e.g., SAP *5P, *6P, *7P, ANP, G4P) follow the ILM process.	MAX3	CNTRY	Financial Serv; Procurement Serv Line;	F&A2090

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Purchasing Card</u>	Review Country Hold List before disposal. Documents purchases using the card (i.e., Procard, P-card, pcard). Includes but not limited to card statement, invoice, receipt or other records that support the purchase.	MAX3	CNTRY	Purchasing; US Card Owner;	F&A8076
<u>Quality Testing - PS Chemicals</u>	Quality test results and lot information for raw material, packaging, finished product and returns. Includes deviation reports, off quality production; hold notices variation reports, rejection reports and disposition notices and may include physical materials/product samples. Retain physical samples long enough to satisfy testing and investigative needs. Excludes samples for R&D and stability testing. ACT = shelf life of product	MAXACT	ACT+1	Product Supply; QA;	PSO2004
<u>Quality Testing - Production</u>	Quality test results and lot information for raw material, packaging, finished product and returns. Includes deviation reports, off quality production; hold notices, variation reports, rejection reports and disposition notices and may include physical materials/product samples. Retain physical samples long enough to satisfy testing and investigative needs. Excludes samples for R&D and stability testing.	MAX3	6	Product Supply; QA;	PSO2010
<u>Quarterly / Annual Financial Results</u>	Results of business activities and financial status of the corporation. Includes published Annual Report to public and shareholders, press releases, analyst scripts, 10K and financial analysis with supporting documentation. ACT = while in use, if record is kept in electronic record system, check with Corporate Archives before purging	MAX5	ACT+CA	Investor Relations; Corporate Acct; Corp Communications;	F&A4025

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Raw Material Testing - R&D GMP</u>	Raw material test results that support consumer testing or clinical trial product governed by GMP (Good Manufacturing Practice). Records may include lot information, chemical / packaging materials, their certificate of analysis, which shows the qualitative analysis of material purchased.	MAX3	6	Central Records; R&D;	PSO2015
<u>Raw Material Testing - R&D Other</u>	Raw material test results that support consumer testing or clinical trial products not governed by GMP (Good Manufacturing Practice). Records may include lot information, chemical / packaging materials, their certificate of analysis, which shows the qualitative analysis of material purchased.	MAX1	2	R&D;	PSO2025
<u>Real Estate - Environmental</u>	Records documenting environmental conditions/incidents (Include but not limited to soil/groundwater sampling, wetland reports, remediation reports, underground storage tank (UST) removal/closure records, hazardous substance spills/releases, on-site waste disposal) and environmental due diligence studies (i.e., Phase I/Phase II environmental site assessments) conducted for real property currently owned/leased or to be purchased, sold or leased. ACT=until property's disposal/sale/lease termination	MAXACT	ACT+125	Real Estate; Site HSE; Corporate HS&E;	HSE1025

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Real Estate - Leased Facilities</u>	Records relating to leased land, buildings, offices and the management of the property during occupancy EXCEPT environmental documents. Includes but not limited to contracts, agreements, insurance policies and maintenance. ACT = until lease is ended	MAXACT	ACT+6	Real Estate;	BUS5010
<u>Real Estate - Owned Facilities</u>	Records of property ownership (land, buildings) and management EXCEPT environmental documents. Includes but not limited to title, deed, purchase & sale agreement, insurance policies and maintenance. ACT = until property is sold	MAXACT	ACT+125	Real Estate;	HSE1040
<u>Recall Documentation - OTC / Medical Devices</u>	Records and back-up supporting finished product recall.	MAX5	25	R&D; QA;	PSO2030
<u>Record of Incident - HSE</u>	Records documenting the investigation and follow up from a health, safety or environmental incident (i.e. reported safety close call, incident, accident, chemical spill). ACT = until closed	MAX3	ACT+6	Site HSE;	HSE2010
<u>Record of Incident - HSE - Canada</u>	Records documenting the investigation and follow up from a health, safety or environmental incident (i.e. reported safety close call, incident, accident, chemical spill). ACT = until report is submitted	MAX3	ACT+10	Site HSE;	HSE2040

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Record of Incident - HSE - Poland</u>	Records documenting the investigation and follow up from a health, safety or environmental incident where an injury occurred (i.e., reported safety, incident, accident, chemical spill).	MAX1	10	Site HSE;	HSE2045
<u>Record of Incident - HSE - Russia</u>	Records documenting the investigation and follow up from a health, safety or environmental incident where an injury occurred (i.e., reported safety, incident, accident, chemical spill).	MAX5	75	Site HSE;	HSE2035
<u>Recycling Records - Canada</u>	Stewardship reports to local government agency listing the weight of packaging sold. Report is used by the agency to determine the fees paid by P&G to cover their recycling costs.	MAX1	5	Gbl Prod Stwdshp;	HSE3090
<u>Recycling Records - Korea</u>	Records related to the management of recycling material subject to waste charging.	MAX1	5	Shipping Office; Site HSE;	HSE3010

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Reference Materials</u>	<p>Internal and external records for reference purposes. Externally published information includes catalogs, publications, photographs, purchased data, customer's public data, etc. Internal records include FAQ's, tips and techniques, authorized signature cards, presentations, contact list, variance letter, forms, issue list, watch list, property inventory, indexes, patent/claim maps, accounting positions, consumer modeling calculations, etc.</p> <p>ACT = while in use or until superseded</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; E020 (Employee Assistance Programs), E022 (Employee Emergency Contact list), E210 (Public Transportation/Parking), E260 (Carfleet).</p>	MAX1	ACT	Various;	BUS5030
<u>Regulatory Financial Reports</u>	Records including the support documentation of required financial reports filed with external agencies such as the Securities Exchange Commission (or its international equivalents). Examples: 10K, 10Q's, 5500's	2	20	Legal; Retirement Planning;	F&A4045
<u>Regulatory Inspections & Investigations</u>	<p>Records documenting results from inspection or investigation by a regulatory agency (i.e. Food & Drug Admin, FDA or other international equivalent). Including violation notice, settlement / agreement and actions taken to resolve any outages.</p> <p>ACT = until closed</p>	ACT	ACT+6	Legal; QA;	LEG3090

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Report - External Relations</u>	Records reporting the summary of a particular business research / analysis / result. If record is kept in electronic record system, check with Corporate Archives before purging.	MAX3	MAX3+CA	Corp Communications; Global Sustainability;	EXR3030
<u>Reports of Authorization</u>	Documents required to approve certain business activities as stated in the Reports of Authorization (ROA) guidelines (excluding ROA's for Capital/Financial Projects). Contains required information for the activity and appropriate signature. ACT = end of activity/project	MAXACT	ACT+2	Authorizing Manager;	BUS8020
<u>Request for Quotation (RFQ)</u>	Records used in the formal bid process including Request for Proposal, bid response and bid analysis documents. ACT = until awarded or closed	MAX1	ACT+3	Purchasing;	BUS5040
<u>Requisition</u>	Records requesting the purchase of goods and services. This results in a Purchase Order.	MAX1	3	Purchasing;	BUS5050

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Research & Analysis - Business</u>	<p>Analysis and reports of marketing, store, consumer, customer, sustainability and competitor data and information. Examples, Shopper Based Design (SBD), market measures (share of shelf), competitive monitoring, consumer's seasonal activity, etc. Does not include Product Initiatives.</p> <p>To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com; C005 (Rating and Review), C006 (Website Analytics), C008 (Coupon Issuing), C009 (Coupon Clearing), C022 (Digital Media Advertising Programmatic), C033 (Advanced Analytics Platforms).</p>	MAX3	MAX5	Owning Dept;	BUS5060
<u>Research & Analysis - Financial</u>	<p>Records detailing external / internal analysis of brokers, banks and individual money managers. Used for asset allocation and selecting new / dropping current money managers, insurance contracts and funding ideas. Could include data that drove or was the basis of a transaction.</p> <p>ACT = until superseded</p>	ACT+3	ACT+6	Capital Markets; Global Pensions;	F&A4055
<u>Research Notebooks; Reports & Summaries</u>	Documents used to capture or record research tests (e.g. Lab Notebook), summary of a project which is limited in scope (e.g. Experimental Summary), or a report that is used to share technical research (e.g. Technical Report). Includes purpose, test description, work done, results, conclusions, observations, etc.	MAX5	125	Central Records;	R&D6070
<u>Retiree Benefit Balance Sheet</u>	Records used for balance sheet reconciliation of pensions and other retiree benefits.	MAX1	1	Global Pensions;	HUM4015

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Retiree Communications</u>	Corporate communications to company retirees on corporate news and events. Does not include benefit information. If record is kept in electronic record system, check with Corporate Archives before purging.	MAX3	MAX3+CA	Employee Communication;	HUM2055
<u>Retirement Data & Acct History</u>	After active period, review Country Hold List before disposal. Records of the status of data bases and participant account balances. snapshots taken at various points in time during significant events. (e.g. fiscal and calendar year end, plan changes, plan initiation / closing, quarterly estimates, etc.) Includes PRE-COPS, COPS, SunGuard history, JPMorgan data, and TrusMark, also includes acquisition data. ACT = active until account is closed	MAX3	ACT+CNTRY	Retirement Planning;	F&A5015
<u>Room Logs</u>	Cleaning, sanitizing and processing of rooms used in product research and testing that requires a clean environment to perform work. Documents may include protocols and reports detailing room use and processing.	MAX3	6	Product Supply; R&D;	PSO2045
<u>SEC Report Submission</u>	Various reports (e.g. RM904, F/X, Cash Flow) and supporting documentation, submitted to the Securities and Exchange Commission (SEC). Does not include Shareholder Services.	MAX3	5	FX/Com; Capital Markets; Treasury Front Office;	F&A5045
<u>SEC Special Accounting</u>	After active period, review Country Hold List before disposal. Records documenting / supporting the 1990 special accounting between P&G / Security and Exchange Commission (SEC) for FAS106 and ESOP2, Employee Stock Ownership Plan. ACT = until superseded	MAX3	ACT+CNTRY	Legal; Corporate Acct; Global Pensions;	F&A6060

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>SPI & Capacity / Sales / Volume Forecast</u>	Records and background data related to the planning of shipment / production / inventory (SPI) and capacity planning of products, goods and services. Typically a 3-24 month forecast, may be daily, weekly or monthly including individual locations or consolidated plans. May include contingency planning, constraints, comparisons, business plans, strategies, reference data, past shipment records, analysis and results. ACT = until superseded	ACT+MAX3	ACT+MAX3	Demand Planning; Category Supply Planning; Site Planning;	PSO2080
<u>SRAP Allocations</u>	Records that are used to assign costs from a cost center to business unit (profit center). Can effect external reporting.	MAX3	7	Corporate Finance;	F&A6095
<u>Safety Inspection - Brazil</u>	Annual report and records of the facility's environmental safety risk inspection that can affect an employee physically (Examples: noise, vibration temperature extremes, radiation, dust, smoke, vapors, bacteria, parasites, viruses) noting measures and controls.	MAX5	20	Site Safety;	HSE1072
<u>Safety Inspections</u>	Documentation and records related to the inspection of facilities and equipment (i.e. electrical, elevators, escalator, drinking fountains). ACT = until superseded	MAX1	ACT+3	Site HSE; Site Operations;	HSE1070
<u>Safety Inspections - Italy</u>	Documentation and records related to the safety inspection of facilities and equipment (i.e. electrical, elevators, escalator, drinking fountain.	MAX1	5	Site HSE; Site Operations;	HSE2080

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Safety Inspections - Singapore</u>	Documentation and records related to the safety inspection of facilities and equipment (i.e. electrical, elevators, escalator, drinking fountains). Includes documents sent to and received from the Commissioner and any reports and records created to meet the workplace safety act.	MAX1	5	Site HSE;	HSE3000
<u>Safety Program - Belgium</u>	Records generated for worker safety relating to inspections, program documents and training records. Includes but not limited to equipment and work area safety inspections, corrective actions, policy & procedures, manuals, SOPs, course listing, training schedules and attendance.	MAX1	5	Training Owner; Site HSE;	HSE3030
<u>Safety Program - France</u>	Records generated for worker safety relating to inspections, program documents and training records. Includes but not limited to equipment and work area safety inspections, corrective actions, policy & procedures, manuals, SOPs, course listing, training schedules and attendance.	MAX1	5	Training Owner; Site Operations;	HSE3032
<u>Safety Program - Mexico</u>	Records generated for worker safety relating to inspections, program documents and training records. Includes but not limited to equipment and work area safety inspections, corrective actions, policy & procedures, manuals, SOPs, course listing, training schedules and attendance.	MAX3	5	Training Owner; Site HSE; Site Operations;	HSE2060
<u>Scientific Advisory Board</u>	Scientific Advisory group reviews, meeting notes, board recommendations and reports.	MAX1	5	R&D;	R&D6080

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Security Administration</u>	Records related to protecting employees, equipment, building, and information. Includes security clearance, visitor information logs, security condition reports, security rounds reports, personal access monitoring data base, emergency phone line recordings and logs. To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E017 (Badges), E025 (Employee Monitoring), E650 (Warehousing (inbound and outbound), E700 (Visitor Access).	MAX1	MAX1	Security;	BUS5080
<u>Security Authorizations - Other</u>	Documentation outlining the qualifications and authorization of a user to have access to a defined area, process, information or software application not affected by GMP, GLP, GCP. ACT = until superseded	MAXACT	ACT+3	System Owner; Security Contact;	BUS5090
<u>Security Authorizations - R&D / PS</u>	Documentation outlining the qualifications and authorization of a user to have access to a defined area, process, information or software application affected by GMP, GLP, GCP for the FDA (Food & Drug Admin or equivalent). ACT = until superseded	MAXACT	ACT+6	System Owner; Security Contact;	BUS9010
<u>Security Surveillance Tapes</u>	Video tapes and computer memory files of security camera monitored areas. To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E025 (Employee Monitoring).	MAX60D	60D	Security;	BUS6000

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Security Surveillance Tapes - EU</u>	Video tapes and computer memory files of security camera monitored areas. To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E025 (Employee Monitoring).	MAX30D	30D	Security;	BUS6001
<u>Senior Management Packages</u>	Records created prior to the senior management meetings that provide status information for specific functional results.	MAX3	MAX10	Corporate Finance;	F&A5055
<u>Shareholder Account</u>	Record of shareholder account activities from creation to closing. Includes personally identifiable information (PII), stock activity history, authorizations, joint holder information, beneficiaries, W-9, etc.	MAX3	75	Shareholder Svcs;	F&A5085
<u>Shareholder Relations</u>	Records related to shareholders including meeting notices, proxies, and other information.	2	6	Legal;	LEG1013
<u>Shareholder Svcs Activities</u>	Records of reports and communications regarding the management and activities of shareholder accounts. Includes communications with shareholders on purchase, sale and complaints. Confirmation of each sale/purchase. SEC's (Securities and Exchange Commission) X-17 reports, requested and examination reports and internal reports on activities, summaries.	MAX1	3	Shareholder Svcs;	F&A6055
<u>Shipment Substantiation - Brazil</u>	Shipping Bill of Lading (BOL), proof of delivery, carrier charges and banking information that show payments made to carriers.	MAX1	5	Shipping Office; Cust Serv & Logistics;	CSL1080

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Site Inventory - Counts</u>	Records relating to the physical and daily accounting of inventory in a Plant by item code (e.g. GCAS#) on warehouse and production floors. Information used to maintain system accuracy between the company inventory system (e.g. SAP) and the mfg (or floor) inventory system (e.g. RTCIS, WAP).	MAX1	1	Production Execution; Warehouse;	PSO2050
<u>Slides</u>	Samples of tissue placed on slides during research studies.	N/A	MAX25	R&D;	R&D3000
<u>Smart Learning Report (SLR)</u>	Record used to share technical, initiative and innovative learning's.	MAX3	10	R&D;	R&D6090
<u>Social Ins Payment - Poland</u>	Evidence of payments (e.g. monthly reports, settlement declarations, adjustment documents, etc.) of contributions to employee's social fund.	MAX1	10	Human Resource;	F&A9075
<u>Social Insurance Records - Poland</u>	Employee payroll records or data used for calculating payment to the Social Insurance pension fund. ACT = Life of employment To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E100 (Payroll/Other Compensation & Social Security/Unemployment).	MAX1	ACT+50	Human Resource;	F&A9065
<u>Source Code</u>	Source code for applications and utility programs developed in-house or when P&G has a responsibility to maintain them. This does not include Computer Qualification, Validation or Change Control records. ACT = while code is needed	MAXACT	ACT+MAX3	Information Technology; System Owner;	BUS6030

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Standby Letter of Credit - no draw</u>	Negotiable instruments requesting another to loan money or give credit to the bearer, and promising repayment. ACT = term of letter	MAX1	ACT+3	Portfolio Mgt - Back Office;	F&A7005
<u>Statue Extension</u>	Consent forms to extend the company's tax year to specified period. LOCE = life of corporation/entity	MAXACT	LOCE+3	Tax;	F&A7035
<u>Stock Register</u>	Itemized record of all daily stock purchases & sales. Shows account name, amount of stock, sale/purchase price, date, receipt/disbursement of monies, certificate numbers.	MAX1	6	Shareholder Svcs;	F&A2085
<u>Strategy Documents</u>	Records documenting strategic approach / plans for a function, department, company or systems. (typically lasting 2-5 years). To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E015 (My Career/Related Assets (5 Rocks, Peak Data, TDS, Rating and Reviews), E019 (Employee Salary Planning).	MAX5	5	Various;	BUS6040
<u>Subject Files</u>	Records detailing Equity Venture or A&D research information by subject.	MAX5	MAX20	Acquisitions & Divest; Equity Ventures;	BUS6050
<u>Substance Assessment - UK</u>	Examination and test of environmental controls and respiratory equipment, including repairs and control changes that prevents and/or controls exposure to hazardous substances.	MAX1	5	Site HSE;	HSE3050

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>System Qualification</u>	Records and documentation relating to the Qualification (Input, Output and Process Qualification) of the operation and performance of equipment, software or process components and change control. ACT = life of system	MAXACT	ACT+3	System Owner; Central Records;	BUS6070
<u>System Validation</u>	Records and documentation relating to the Qualification (Input, Output and Process Qualification) of the operation and performance of equipment, software or process components and change control, in compliance with Food & Drug Administration (FDA, or other international equivalent). ACT = life of system	MAXACT	ACT+8	System Owner; Central Records;	BUS6065
<u>Systems Technical / User Documentation</u>	Technical or user documentation for systems developed internally or purchased externally. ACT = until superseded or shutdown	MAXACT	ACT+MAX3	System Owner;	BUS6090
<u>Tax - Income (National)</u>	Records of tax payments, authorized requests and all foreign (e.g. 905 cover sheet, 901, Schedule M, etc.) and domestic forms sent to a government revenue agency such as the IRS (Internal Revenue Agency or international equivalent). Excludes Work Papers (F&A5090).	MAX5	100	Tax; Tax Compliance Group;	F&A1075
<u>Tax - Income (S&L)</u>	State and local (i.e. non-national) income tax filings & payments, as well as audits related to these areas. ACT = actual period the documents are subject to audit.	MAX3	ACT	Tax; Tax Compliance Group;	F&A1080

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Tax - Other</u>	Review Country Hold List before disposal. Transactional and property tax related filing at any level including audits related to these areas.	MAX3	CNTRY	Tax; Tax Compliance Group;	F&A3075
<u>Tax - Work Papers</u>	Review Country Hold List before disposal. Work papers that support national income or other tax filings. Excludes Financial Statements (F&A6080).	MAX3	CNTRY	Tax; Tax Compliance Group;	F&A5090
<u>Tax Exemption Certificates</u>	ILM review process. Certificates provided by customers supporting their exemption from sales tax. Review and disposal of Official records retained in centralized corporate systems (e.g. ECM) follow the ILM process. ACT = active until superseded by new certificate or customer relationship is ended.	MAX3	ACT+CNTRY	Financial Serv;	F&A1090
<u>Tax Incentives</u>	Records detailing incentives (property tax abatements, state income tax credits, sales tax exemptions, training grants, low interest financing, withholding tax rebates, bond documents, etc.) to attract / maintain business and jobs, usually for expanding businesses and facilities. Includes original copy of the agreement / bond and key related correspondence. ACT = period of eligibility	MAXACT	ACT+5	Tax;	F&A8015
<u>Training - Other - UK</u>	Records related to dangerous goods transportation training certification including course material, proof of attendance and qualification. ACT = life of certification	MAX1	ACT+3	Training Owner;	HSE3020

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Training - Safety - Australia</u>	Records related to hazardous and safety training to employees. Includes course listing, class schedules, materials, proof of attendance and qualifications	MAX3	5	Training Owner;	BUS7035
<u>Training Materials - Other</u>	Training manuals and materials for non GMP, GLP, GCP related training. ACT = material is superseded	MAX1	ACT+3	Training Owner;	BUS7043
<u>Training Materials - Regulatory</u>	Documentation of each course's content including any material, manuals, job aids for training that support product work under GMP, GLP, GCP (or international equivalent). ACT = material is superseded	MAX1	ACT+6	Central Records; Product Supply; R&D;	BUS7045
<u>Training Records - Other</u>	Training records for each employee that do not support product work under GMP, GLP, GCP (or international equivalent). May include certification, knowledge checks, course information. ACT = period of employment To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E470 (Employee - External/Internal/Strategic/Function Training Course).	MAX1	ACT+3	Training Owner;	BUS7030

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Training Records - Regulatory</u>	Training record for each employee that supports product work requiring training under GMP, GLP, GCP regulations (or international equivalent). May include curriculum vitae (CV's), completion certificates, and knowledge checks. ACT = period of employment	MAX1	ACT+6	Central Records; Product Supply; R&D;	BUS7025
<u>Transaction Requests - Audio</u>	Recording of requests to initiate a financial or banking transaction. ACT = until transaction is completed	ACT+180D	ACT+180D	Portfolio Mgt - Back Office; Treasury Front Office;	F&A8070
<u>Transition Files</u>	Records describing the transition process for money manager changes including selecting the transition managers. ACT = until superseded	ACT+3	ACT+3	Global Pensions;	HUM2095
<u>Unclaimed Property - USA</u>	Records documenting P&G's escheatment process to have checks to others deposited before being reported and sent to US State governments.	MAX3	10	Financial Serv;	LEG1010
<u>Unsolicited Deals & Ideas</u>	Unsolicited ideas, technologies and inventions submitted to P&G. May include specifications, correspondence, samples, etc.	MAX3	5	Patent; External Bus Dev;	BUS3030
<u>Valuation Records</u>	Review Country Hold List before disposal. Records related to the financial and accounting reporting standards for US retiree medical and pension benefits. Includes supporting documentation and valuations for FAS106, FAS108, etc.	MAX3	CNTRY	Retirement Planning; Global Pensions;	HUM6010
<u>Vendor File</u>	Reports and documentation on vendor may include, catalogs, price lists, correspondence and qualifications. ACT = while vendor is active	MAXACT	ACT+3	Purchasing;	BUS7070

Record Name	Description	Max Copy Retention	Official Retention	Official Record Holder	Record Series
<u>Vendor Sustainability Compliance Data</u>	Records that are used to monitor the compliance of key suppliers and contractors regarding issues such as employment, discrimination, environment and health and safety.	MAX2	2	Global Sustainability;	EXR3060
<u>Vendor Tax ID</u>	Review Country Hold List before disposal. Records documenting a creditor's tax identification number. ACT = while the vendor is active	MAX3	ACT+CNTRY	Accts Payable;	F&A8090
<u>WHT Certificates</u>	Review Country Hold List before disposal. Certificate indicating appropriate taxes are withheld from a payment.	MAX3	CNTRY	Financial Serv;	F&A2051
<u>Wet Fixed Tissues</u>	Tissue samples stored in preservatives or encased in paraffin blocks for research studies. Wet specimens which are relatively fragile and differ markedly in stability and quality during storage shall be retained only as long as the quality of the preparation affords evaluation or local minimum regulatory retention time.	N/A	MAX10	R&D;	R&D7060
<u>Work Plan</u>	An individual's annual work plan, listing objectives/goals, success criteria and results. To manage PII data within MaxCopy/Official retention time, review Scope documents at privacyscope.pg.com ; E015 (My Career/Related Assets (5 Rocks, Peak Data, TDS, Rating and Reviews).	MAX5	5	Human Resource; Manager;	HUM3025

Retention times are reviewed annually. If you know of a law that is not being met, send an email to businessconduct.im.

RETENTION TIME KEY:

- number of complete years to retain record. Example: 5 = retain for 5 complete years before disposal. A 12/31/2018 record is discarded after 12/31/2023.

ACT - retain for active period, then discard when record becomes inactive.

ACT+# - retain for active period plus number of complete years before disposal. Example: ACT+3 = retain 3 complete years from Inactive Date. A record that became inactive on 12/31/2019 is discarded after 12/31/2022.

ACT+MAX# - retain for active period, then may be retain the complete number of years or less, as determined by the end user. Example: ACT+MAX3, may be discarded at any time between one day up to a maximum of 3 years. If subject to Internal Audit, retain enough records (e.g. 6 months, 12 months) to create a sufficient auditable amount.

ACT+CNTRY/LOCE+CNTRY – When the record or corporation/entity is no longer active, review the Country Hold List, column L, for the current open audit years for your country/region using the inactive/closed/completed date of the record. Example: USA lists FY 07/08-Present open audit years. Inactive records for FY 06/07 and back are destroyed.

+CA – Contact Corporate Archives (archives.im@pg.com) before disposal. They will inform you to either send or continue to dispose of the record.

3CA - retain for 3 complete years from Document / Record Date then contact Corporate Archives (archives.im@pg.com) before disposal. They will inform you to either send or continue to dispose of the record.

CNTRY – Review the Country Hold List, column L, for the current open audit years for your country/region. Prior years not listed are destroyed during the next record review cycle. Example: USA lists FY 07/08-Present open audit years. Records for FY 06/07 and back are destroyed.

Days (D) - number of days to retain record. Example: 30D = retain for 30 days from Document / Record Date before disposal.

MAX# - may be retained the complete number of years or less, as determined by the end user. Example: MAX3 = May be discarded at any time between one day up to a maximum of 3 complete years. If subject to Internal Audit, retain enough records (e.g. 6 months, 12 months) to create a sufficient auditable amount.

MAXACT - may be discarded during active period but must be discarded when it becomes inactive.

MAX50M – Dispose of record from opt-out date plus 50 months maximum or after 50 months maximum of inactivity. Check with local resources for other possible restrictions.

LOCE+# - retain for Life of Corporation/Entity plus complete number of years specified. Example: LOC+3 = retain 3 years from end of corporation/entity date. Entity ended 6/30/2019, dispose of after 6/30/2022.

RETENTION TIME KEY

- number of years to retain record. Example: 5 = retain for 5 years from Document / Record Date before disposal. A 12/31/2010 record is discarded after 12/31/2015.

MAX# - may be retained from one day up to the maximum years specified as determined by the end user. Example: MAX3 = May be discarded at any time between one day and 3 years from Document / Record Date. Retain records used to support a CSA/IA long enough (e.g. 6 months, 12 months) to create a sufficient auditable amount.

MAX6M – may be retained from one day up to a maximum of 6 months. Example: Decision to discard Consumer PII data 3 months after the relationship with the consumer has ended.

MAXACT - may be retained for active period. MAXACT = may be discarded during active period but must be discarded when it becomes inactive.

CNTRY – Review the Country Hold List for the current open audit years for your country/region. Prior years not listed are destroyed during the next record review cycle. Example: USA lists FY 07/08-Present open audit years so continue to keep. Records for FY 06/07 and back are destroyed.

ACT+# - retain for active period plus number of years specified before disposal. Example: ACT+3 = retain 3 years from Inactive Date. A record that became inactive on 12/31/2010 is discarded after 12/31/2013.

ACT+CNTRY/LOCE+CNTRY – When the record or corporation/entity is no longer active, review the Country Hold List for the current open audit years for your country/region using the inactive/closed/completed date of the record. Example: USA asset record was depreciated/closed in 2010/11. USA lists FY 07/08-Present open audit years so the record is kept until USA is listed as FY 11/12-Present or later as the hold years.

ACT+MAX# - retain for active period, then for one day up to number of years shown. Example: ACT+MAX3, may be retained from one day up to 3 years maximum from Inactive Date before disposal. Retain records used to support a CSA/IA long enough (e.g. 6 months, 12 months) to create a sufficient auditable amount.

+CA - records become the responsibility of Corporate Archives. Disposal is at the discretion of Corporate Archives. Example: MAX3+CA = may be retained from one day up to the maximum years specified as determined by the end user from Document / Record Date then send to Corporate Archives.

3CA - retain for 3 years from Document / Record Date then contact Corporate Archives. Corporate Archives may take responsibility for the records. Discard records Corporate Archives does not take.

ACT - retain for active period. Example: ACT = discard when record becomes inactive.

Days (D) - number of days to retain record. Example: 30D = retain for 30 days from Document / Record Date before disposal.

FY+# - Fiscal year plus number of years stated. Example: you currently have records for 2010_11, 2009_10 & 2008_09. Records for 2007_08 are discarded after June 30, 2011.

LOCE+# - retain for Life of Corporation/Entity plus number of years specified. Example: LOC+3 = retain 3 years from end of corporation/entity date.

LOCE+CA - Life of Corporation/Entity then contact Corporate Archives for guidance. Corporate Archives may take responsibility for the records. Discard records Corporate Archives does not take.



**comprehensive economics
economic consultants**

PRELIMINARY ENVIRONMENTAL IMPACT
STATEMENT FOR AN INDUSTRIAL
LANDFILL OPERATED BY
SERVICIOS CARBAREON, INC.
BOS. ENCARNACION Y TALLABOA SALIENTE
PEÑUELAS, PUERTO RICO
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TABLE OF CONTENTS

	<u>Page</u>
I. PROPOSED ACTION	1
1. Description of the Problem	1
2. Description of the Project	3
a. General	3
b. Project Location	4
c. Accessing the Project	6
d. Attributes of the Waste Received	8
e. Methods Used in the Project for Waste Disposal	19
1. Cultivation Method	19
2. Chemical Filling Method	24
a. Disposal in Trenches	25
b. Disposal in Drums	27
d. Available Filling Material	29
3. Evaporation Pond Method	29
f. Analysis for Determining the Disposal Method	30
g. Specific Data on the Project's Disposal Processes	31
h. Reception and Processing of all Waste	41
i. Liquids from Leaching	44

	<u>Page</u>
j. Proposed Sampling in the Project	44
k. Proposed Maintenance and Monitoring for the Facilities once their Service Life has Expired	51
l. Reuse of the Waste	52
m. Inventory of Similar Existing Facilities	55
II. ENVIRONMENTAL ASPECTS	57
1. Climate	57
2. General Geological Attributes	57
3. Structural Geology, Hydrogeology, and Project Site Soils	67
a. Soils	67
b. Area Geology	68
c. Structural Geology	74
d. Area Hydrogeology	75
e. Geological Engineering Considerations	77
h. Seismology	78
4. Topography	79
5. Flora and Fauna	81
a. Fauna	81
b. Flora	82
6. The Project Area's Geographical Characteristics	84
7. Economy	85
2. Land Use	85
III. ALTERNATIVES TO THE PROPOSED ACTION	87
1. Non-action Alternatives	87
2. Different Location Alternative	88

	<u>Page</u>
3. New Technology and/or Different Design Alternatives	89
4. Effect of Gradual Action (by phase)	89
5. Different Actions that Could Obtain the Same Result	90
6. Resource Recovery	90
IV. ENVIRONMENTAL IMPACT OF PROPOSED ACTION & ALTERNATIVES	91
1. Introduction	91
2. Impact on Water Quality	91
a. Impact on Surface Water Quality	91
b. Impact on Underground Water Quality	93
c. Impact on Aquifers in the Tallaboa River Valley	95
3. Impact on Noise Quality	96
4. Impact on Ecological Resources	96
5. Impact on Vehicle Movement	97
6. Impact on Land Use	97
7. Impact on Aesthetics	98
8. Impact on Community Development	98
9. Impact on the Area's Cultural Resources	99
10. Socio-Economic Impact on the Area	99
11. Energy Use and Conservation	101
12. Impact on the Area's Growth	102
13. Environmental Impact on Existing Processes	102
a. Environmental Impact on the Project's Liquid Waste Treatment System	102
b. Chemical Filling	103

	<u>Page</u>
c. Complaint Process concerning Combustible Waste	104
14. Environmental Impact on Future Operations	104
a. Liquid Waste Treatment System	104
b. Chemical Filling	105
c. Incineration	105
d. Handling Drums	105
e. Storage of PCB	107
V. IRREVERSIBLE OR IRREPARABLE ENVIRONMENTAL DAMAGE	108
1. Introduction	108
2. Non-biodegradable Liquids and Solids	108
VI. MEASURES FOR AVOIDING OR MITIGATING ADVERSE	
EFFECTS ON THE ENVIRONMENT	110
1. Measures for Controlling Water Pollution	110
2. Measures for Controlling Air Pollution	111
3. Measures for Controlling Noise Pollution	111
4. Measures for Controlling Liquid & Solid Waste Pollution	112
5. Measures for Mitigating Aesthetic Impacts	112
6. Cultural Resource Considerations	113
7. Measures for Controlling Interference with the Area's Traffic and Community Activities	113
8. Spillage Prevention and Emergency Avoidance Plans	113

	<u>Page</u>
a. Measures for Controlling Spills during Waste Transport	113
9. Health and Safety Factors	114
10. Measures for Controlling the Impact of Fire	114

VII. ADDENDUMS

1. "Waste Disposal Site Directory"

2. Maps

Catchment Area

3. Analysis

4. "Ground Water Level Determination – Jaca, Sierra, y Rivera"

A. "Relative Value of Soil Permeability"

5. Soil Conservation Service Report

6. Toxic Substance Management and Safety Manual

(Servicios Carbareón, Inc.)

INDEX OF ILLUSTRATIONS

<u>Fig.</u>		<u>Page</u>
1. 1	Aerial Photo of Landfill Location and Attached Facilities	5
2. 1A	Project Accesses	7
3. 2	Landfill Plant and Disposal Area Location	20
4. 2A	Layout of Biodegradation Waterhole	31
5. 3A	Location of Landfill and Peñuelas	58
6. 3	Average Minimum Temperature-January	59
7. 4	Average Maximum Temperature-January	60
8. 5	Average Minimum Temperature-July	61
9. 6	Average Maximum Temperature-July	62
10. 7	Average Annual Temperature (F°)	63
11. 8	Average Annual Precipitation in (Inches)	64
12. 9	"Total Evaporation and Wind Movement"	65
13. 10	"Water Balance Diagrams"	66
14. 11	Partial Picture of Landfill Land plots	69
15. 12	Partial Picture of Landfill Land plots	70
16. 13	Partial Picture of Landfill Land plots	71
17. 14	Partial Picture of Landfill Land plots	71
18. 15	Geological Profile Locating the Project's Position	73
19. 16	Flood Zones on the Southern Coast of Puerto Rico	80

INDEX OF TABLES

<u>Table</u>		<u>Page</u>
1. 1.1. a. 1.	Amount of Industrial Waste Generated in Puerto Rico in 1979	16
2. 1.1. a. 2.	Additional Amount of Industrial Waste Generated in Puerto Rico in 1979	17
3. 1.1. a. 3.	Breakdown of Waste Handled in the Project by Disposal Method	18
4. 1.2. g. 1.	Waste and Disposal Table (1979)	37
		38
		39
		40
5. 1.2. i. 1.	Sampling Program for Wells	48

SUMMARY OF ENVIRONMENTAL IMPACT STATEMENT

ISSUED BY THE PLANNING BOARD

FOR AN INDUSTRIAL LANDFILL

OPERATED BY SERVICIOS CARBAREÓN, INC.

IN THE MUNICIPALITY OF PEÑUELAS

A. Type of Action: Administrative

B. Description of the Action

Development of a disposal system for industrial waste by way of controlled methods at a site located approximately three (3) kilometers to the east of kilometer 2.7 of State Highway #385 in the Encarnación y Tallaboa Saliente neighborhoods of Peñuelas.

C. Environmental Impact and Adverse Environmental Effects

The primary impact of the project will be favorable towards the environment since it will help with the urgent problem of controlled disposal of industrial waste in Puerto Rico, aiding in the protection of public health and community welfare. Undesirable effects will be minor in scale causing irreversible effects on a small part of the project and affecting the destruction of the existing flora on the property in the short term, which would be replaced appropriate natural vegetation once the operation has been completed. The site selected and the control measures to be taken minimize the undesirable effects on the environment caused by this action.

D. Alternatives Considered

1. The Alternative of No Action

The alternative of no action would involve the elimination of the operation of this industrial landfill, which is the only facility of its kind in Puerto Rico that has operated under the control and temporary permission of the Environmental Quality Board (“JCA” for its Spanish acronym). Were it to be closed, disposal would have to be directed to the United States in the short term or to other places or municipal landfills within Puerto Rico. In the first scenario the cost of disposal of said waste would increase by at least three (3) times. This cost would be very significant in the case of small and medium industries that generate small amounts of industrial waste and that comprise more than 60% of all industries in Puerto Rico.

Additionally, disposal in the United States or any other location would depend completely on a marine transportation system due to our status as an island, which would place us at the mercy of a system that by its very nature is not continuous, forcing us to preserve quantities of this waste at some site on the island until they are shipped.

The second option would imply the risk of very damaging pollution of the environment due to the fact that it would be disposed of at sites that are not prepared to receive this waste, nor have qualified personnel to handle it.

Moreover, Servicio Carbareón’s operations provide an economic stimulus to the local economy that would be lost in the event that their operations had to close.

For these reasons, the alternative of no action is not recommended in this scenario.

2. Different Location Alternative

A preliminary study was conducted using the topographic quadrangles of the United States Geological Survey (U.S.G.S.) and the Hydrogeological Map of Puerto Rico to cover the entire Island. From this survey, it became evident that, due to its drier climatological conditions, soil types, and hydrogeology, the Southern Zone is more apt for this type of operation than the Northern Zone. There are also several locations from Sabana Grande to Patillas that possess similar conditions to those of the land pertaining to the project in question: however, these are more affected by urban or rural housing developments or by important agricultural activity than the project in question. These locations are mountainous terrain to the north of the Valley of Lajas, the mountainous terrain to the north of the Valley of Barinas in Yauco, and the mountainous terrain to the north between Salinas and Güayama.

Furthermore, none of these sites has ever experienced this type of activity before, making it necessary to merely speculate when trying to determine the possible effects. This is why the alternative of a different location is not recommended.

3. New Technology and/or Different Design Alternative

Let us proceed to examine alternative technologies one by one in comparison with the proposal:

a. Ocean dumping – this practice will be abolished by federal law in June of 1981, whereby it is automatically ruled out.

b. Incineration – this technology is limited to organic substances. Such substances compose 60% of all industrial waste, so the remaining 40% could not be disposed of.

This technology is recommended for the future as a complement to the project's current operations.

c. Other technologies – we are not aware of other technologies that comply with established requirements and are also economically viable.

4. Effect of Gradual Action (by phase)

Since the project is already in operation, we have to assume as a starting point the current level of operations in terms of the volume of waste that is disposed of and the area it occupies. Starting with this foundation, it is possible to gradually go about increasing that level of operation at a rate no greater than that which would allow periodic evaluation of its effects on the environment. The recommended growth period, by area and volume, will be a minimum of five (5) years until a maximum capacity level of 70% of the production of industrial waste in Puerto Rico is reached. The balance must be absorbed by other local operations that are smaller and/or more specialized and by exporting to similar sites in the United States and other locations. Such growth and capacity are recommended to provide greater flexibility to this waste disposal system in Puerto Rico. This would increase the safety factor of the operations and thus maintain their viability.

5. Different Actions that Could Obtain the Same Result

Besides the actions already examined, we do not believe that there is any other different action that could obtain the same result.

6. Resource Recovery

Currently and at the present level of processed volume, there

is no technology to economically recover the materials that are potentially recoverable.

E. Agencies, Organizations, or Individuals that have Issued Commentary

None so far for this proposal.

F. Dates for Sending to the Environmental Quality Board

Preliminary Environmental Statement – May of 1980

G. Official Responsible for the Statement

Planning Board
Minillas Governmental Center
Santurce, Puerto Rico

H. Issues Pertaining to Federal Memo A-95

Not applicable

SUMMARY OF ENVIRONMENTAL IMPACT STATEMENT

ISSUED BY THE PLANNING BOARD

FOR AN INDUSTRIAL LANDFILL

OPERATED BY SERVICIOS CARBAREÓN, INC.

IN THE MUNICIPALITY OF PEÑUELAS

I. PROPOSED ACTION

1. Description of the Problem

The economy of Puerto Rico changed drastically during the decade of the 1950s when it was transformed from a static, agricultural economy to a dynamic and industrial one. Hundreds of industries of all kinds including textiles, clothes, pharmaceutical, petrochemical, steelworks, and electronics have settled in Puerto Rico during the last 30 years. This newfound industrialization has inevitably incurred a problem with disposal of dangerous and/or toxic industrial waste.

Originally, not much importance or thought was given to this problem. Today, however, awareness has been raised around the world concerning this issue and our Island is certainly no exception.

In Puerto Rico industrial waste has been being disposed of with official approval in the project which is the object of this document, in the ocean, in municipal landfills, in private landfills belonging to particular industries, and possibly illegally and secretly in rivers,

ravines, and other inappropriate locations.

This Environmental Impact Statement analyzes this problem and the impact caused to the environment by the operation of the only public landfill of this kind that has been operating in Puerto Rico during the last few years under the supervision of the government agencies that deal with this problem. (The term "public" is used here in the sense of a facility open to serve all or almost all of Puerto Rican industry and not just one industry in particular. The use of this term should not be understood as referring to a government agency.) This document has also been coordinated with the content of the plans labelled "Carbareón Industrial Landfill Improvements" as prepared by the firm Colondres & Laboy of Santurce dated May 1980.

The problem has worsened with the passage of time due to the fact that the amount of industrial waste generated increases with each new industrial activity established. It is for this very reason that it is so important for all of us to face this problem as from now, rationally and responsibly, to ensure the enjoyment of the environment of future generations of Puerto Ricans.

2. Description of the Project

a. General

The project that is the subject of this Statement is an industrial landfill in which substances that are or can be toxic or dangerous are disposed of. This operation is necessary in Puerto Rico due to the industrial activity on the Island, but which due to its nature must have its benefits weighed against the potential danger that it represents to the environment. The analysis of this exact situation is the very core of this document.

The purpose of this landfill is to provide an adequate site for the disposal of industrial waste under systematic control to minimize the possibility of damaging the environment.

The project is known as Servicios Carbareón, Inc., a family business with local capital organized under the laws of the Commonwealth of Puerto Rico.

The operations carried out in the industrial landfill entail the use of labor, trucks, heavy equipment, and safety equipment. All of these operations are controlled by Servicios Carbareón, Inc. Companies not belonging to Servicios Carbareón Inc. are not permitted to use the facilities. This allows a strict level of control of the landfill's activities.

The landfill has been operating for four (4) years in advance of consultation and individual disposal permits granted by the Environmental Quality Board. This is how it has operated until January

1980. Currently a Cease and Desist Order has kept the landfill closed. The necessary steps are being taken to operate with a permanent permit in accordance with the regulations of the Environmental Quality Board.

b. Project Location

The industrial landfill is located on two adjacent properties with a total area of 33 “cuerdas¹” approximately, leased to Sucesión Valdivieso on the boundary between the Encarnación and Tallaboa Saliente neighborhoods of Peñuelas, on semiarid plots of land that have no development planned for agriculture, industry, housing, or any other use. The bordering lands are used for limited cattle grazing, but due to the arid conditions and lack of water, both the water and most of the feed are transported to provide to the cattle from other areas. The landfill does not have water or electrical energy services. The landfill operates from Monday to Friday within normal business hours and also runs during holidays, if needed.

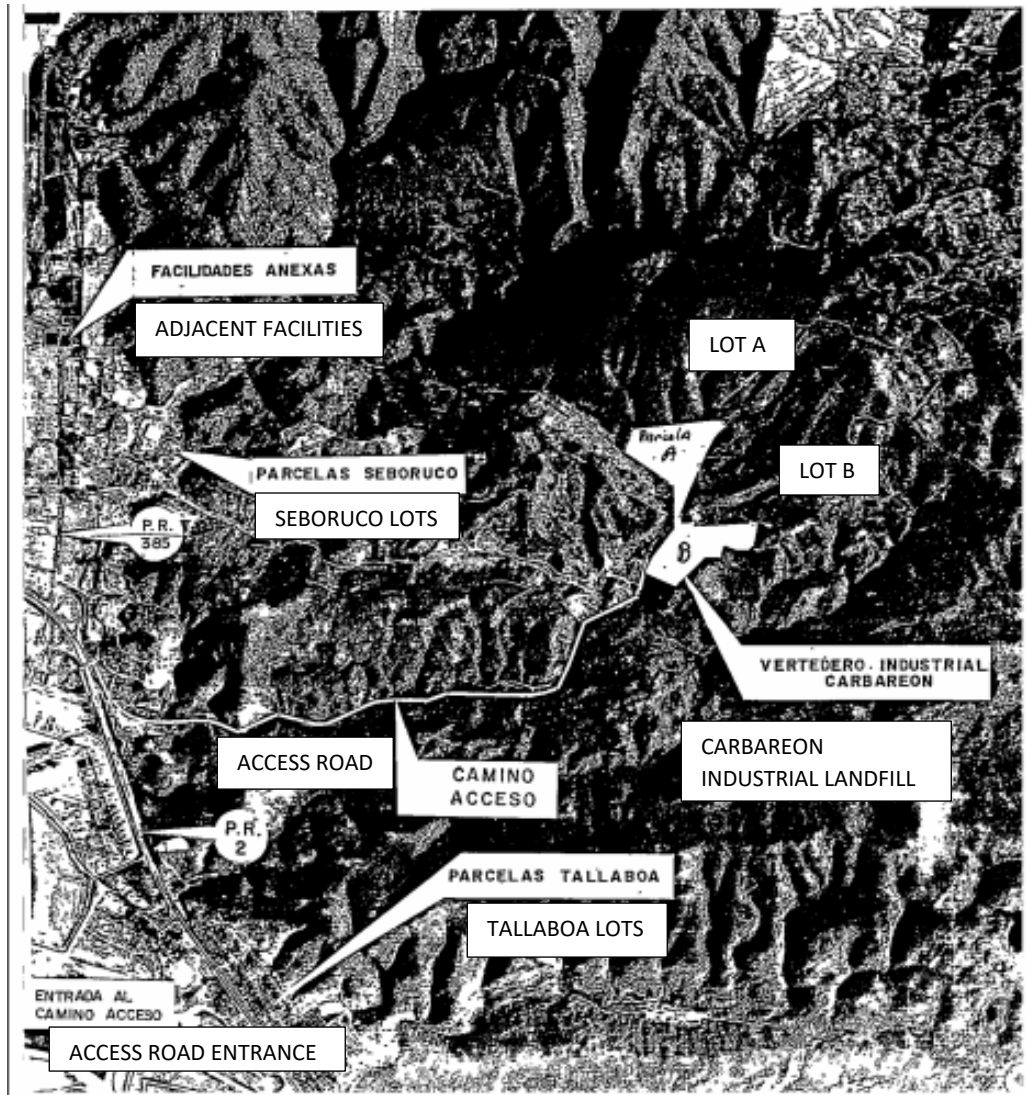
The administrative and logistical operations of the landfill are not located within the landfill proper but rather at a lot division of 1.5 “cuerdas” approximately, at the 3.5 kilometer marker of Carretera #381. At this site are the office facilities, maintenance workshops, and storage materials. From here, the landfill's operations and those of transporting the waste from different industries around Puerto Rico are controlled.

The aerial photograph on Page 5 (Fig. #1) shows

¹ One “cuerda” is approximately 400 square meters.

LANDFILL LOCATION AND ADJACENT FACILITIES
INCLUDING ACCESSES AND NEARBY POPULATION CENTERS
PEÑUELAS PUERTO RICO

Fig. 1
Page 5



the aforementioned facilities and their respective locations very clearly.

c. Accessing the Project

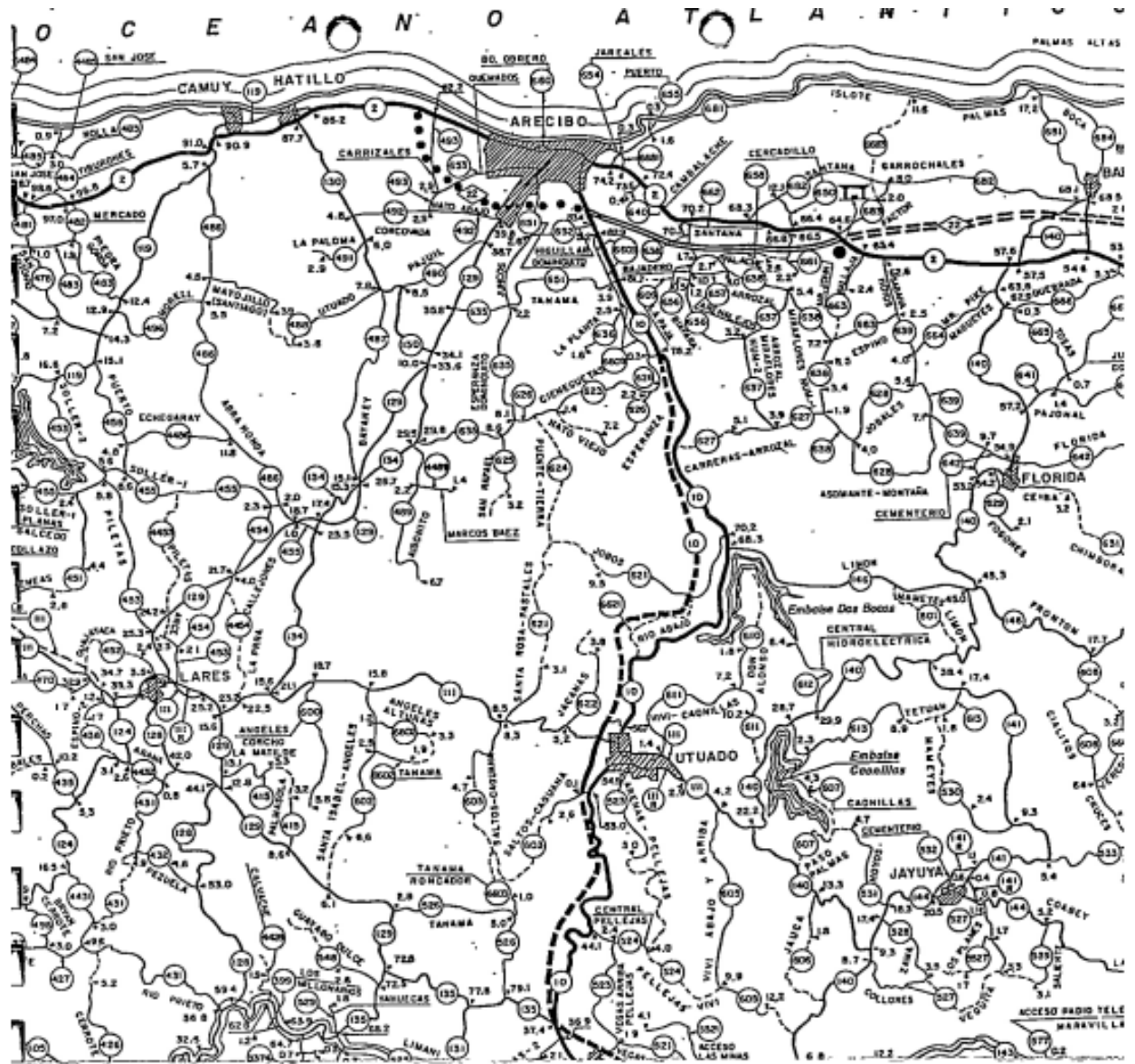
Access to the lands is limited to a primary private farm road that is controlled by Sucesión Valdivieso, owners of all of the lands at this location. There is a second access but this is in very poor condition and impassable for regular use.

This access is made up of a road semi-paved with fill material at the 2.7 kilometer marker of Carretera #385, in the area of Tallaboa del Bo. Encarnación de Peñuelas. This highway, in turn, has an access at this same site to Express Highway #2 between Ponce and Mayagüez which connects directly with the San Juan metropolitan area and the north and east of the Island via Las Américas Highway (PR52). From here we can determine that the project has sufficient access points from all over the Island (See Fig. 1A).

The internal transportation system is made up of a network of semi-paved roads that interconnect the different disposal areas. Waste is transported to the landfill in tanker trucks, flatbed trucks, or closed bed trucks, depending on the type of waste. During periods of heavy rains (more than one (1) day of intense rain) traffic in the project area is reduced by 50%.

The access itself has a length of approximately 3 kilometers until it arrives at the landfill facilities. In its lower part and its higher part, that is, from start to finish, the road travels

"ATLANTIC OCEAN"



parallel to the main drainage basin that the mountains here have in the area for rain water. At the section of one kilometer and a half, the intermediate part of the road has been fixed in such a way that it is passable regardless of the rain that falls in the area. There is still a need to fill or pave areas that, under heavy rain, given that there are low lying areas, become impassable for the movement of trucks. However, at all times the landfill is connected using four-wheel drive trucks regardless of how long the periods of rain are. Plans are in place to continue to improve the road until it becomes a permanent form of access for all vehicle types including large tanker trucks holding 8,250 gallons. This is what is indicated in the landfill's improvement plans.

d. Waste Attributes

Basically two (2) types of refuse are received: inorganic (which is buried in a sanitary landfill, whether in drums or directly into the ground) and organic (which is disposed of in anaerobic biodegradation systems or buried inside drums).

The waste received by Servicios Carbareón is completely derived from plants that have industrial processes on the Island of Puerto Rico. These industries are divided into the following categories: pharmaceutical, petrochemical, electroplating factories, factories for the production of integrated circuit cards and other types of factories of a miscellaneous nature that include

companies dedicated to the manufacture of ink, companies whose line of business is the manufacturing of potentiometers for electronic instruments, and companies that assemble instruments for analyzing metals.

All of this refuse is categorized as dangerous waste by current legislation, both federal as well as local. Not all of it is toxic, although some of the waste managed falls into a category considered to be toxic material. Naturally, the majority of these toxic waste products categorized as such, not because of any impossibility or difficulty in handling or degrading them, but because they are categorized this way because the employees that handle them during the different production processes, by being in contact with these materials day after day, during eight (8) hours of work, may develop diseases.

Of the waste handled at the landfill that can be considered toxic when applied to the ground, only a few would be classified as such. Essentially the waste received at the Servicios Carbareón Inc. landfill can be divided into two (2) categories. These are the organic and inorganic substances. The organic substances, for the most part, are those that can biodegrade. In other words, they are substances that bacteria can use as a form of food and degrade them into CO₂ and water. In the case of this project, upon using the anaerobic systems there is also a methane

product in the oxidation of these organic substances. It is important to emphasize the fact that organic decomposition (aerobic or anaerobic) is equivalent to artificial incineration. With incineration of organic material, these organic products oxidize at high temperatures to form CO_2 and water and another compound that depends on the attributes of the waste material. For example: hydrocarbons chlorinated upon incineration produce the gas HCL (the gas that converts into hydrochloric acid upon mixing with water). Biodegradation is equivalent in this artificial oxidation at high temperatures to incineration when these organic waste substances are treated with bacteria (in this case anaerobic bacteria). The bacteria uses this waste as food and when digested the products that are generated from this oxidation are formed, which is also what every human being does, oxidize nutrients. The products generated are CO_2 water and methane. Methane is controlled as an organic that goes into the air but this is only in the case of a source of industrial emissions. There are treatment plants in which there are systems to recover this methane and use it to burn it and obtain energy. Methane is the natural gas that is burned in different places throughout the world to obtain energy. Currently there is a project in the Carite de Güayama Neighborhood where the waste from a pigsty is being used, treated in a way that is similar to ours in anaerobic reactors and the methane is extracted. This project is under a federal plan and is an experimental project. In our case, the larger part of the waste that is received consists of

lubricating oils and fuel oils, which for the most part are the remains of petroleum, solvents that include alcohols, acetones, and other organics that are used as solvents in various industries. All of these solvents are biodegradable and when treated in an anaerobic reactor, the product completely disappears leaving behind a residue that is not a danger to the environment.

The organic waste is mostly inorganic salts. These are commonly existing salts in our environment in high quantities and which are contaminated with heavy metals that are strictly controlled due to their toxicity to human health. These heavy metals include zinc, chromium, nickel, in some cases small quantities of tin, copper, and others. The greatest risk from these heavy metals is that they can come in their ionic form, travel through an environment, whether by land, the atmosphere, or liquids, and make their way to bodies of water that can be used as drinking water. The treatment given to this kind of contaminated inorganic material with heavy metals is that of chemical filling if the material comes in drums. If it arrives in tankers, it is then given a sanitary landfill treatment. In either case the purpose is the same. The dumping ground has soil characteristics such that they will not allow the movement of these metals through their layers to make it to a possible body of water that could be used for drinking water. Also for greater safety, all of this waste, all of this mud that contains these heavy metals, is maintained with a degree of alkalinity with a high

pH (more than 10) to ensure that all of these metals remain in their state as an inorganic salt and unable to travel or move through the ground. It is practically impossible for a metal that is bonded in the form of an inorganic salt to travel through the ground. Metals move through the ground when they are in their ionic state and this ionic form can only be achieved if these salts have contact with acids that dissolve these molecules.

There are some kinds of refuse that could be categorized as unusual because it is in fact difficult to assign them a clear definition due to their number. All of them fall under these general categories of organic and inorganic products. There are inorganic products that only need to be dried and given sanitary landfill treatment because their very nature is stable. This is the case for activated charcoal and that of waste that is derived from sanitary treatment plants. When septic tanks and other kinds of mud are cleaned, they are stable by nature. Most of this type of mud that is stable and is handled at the dumpsite is residue from tuna that comes from a tuna processing plant in the area of Ponce Beach, which only needs to be dried and buried. This tuna is basically protein and the only potential danger to the environment is that if it is left exposed to the elements without proper care it decomposes and causes unpleasant smells.

In truth, the main characteristic that makes this category of waste dangerous is that most of it is corrosive waste. In the case of acids and alkaline solutions, these are refuse that can irritate skin. This is waste that can react

violently with water, which is the case of concentrated acids and some organic products. This is waste that has strong odors and irritate mucus membranes and it is waste that must be categorized and strictly handled properly.

Let us examine the problem of corrosiveness. The largest client of this dumpsite has an alkaline solution containing sodium hydroxide and other inorganic salts, which are completely non-toxic, but highly dangerous because they are highly corrosive. This waste is received in drums, which are emptied and the waste is stored in an evaporation pond constructed entirely of clay walls. This waste contains 60% water and the other 40% consists of the aforementioned inorganic salts. Therefore, no further treatment is required for it except for drying. The evaporation pond contains liquid at all times since this process of emptying the drums is done periodically. When the evaporation pond accumulates a noticeable amount of solids, these solids are then left to dry off completely and be dumped into a sanitary landfill. Another client is a firm that has a treatment system to eliminate the fish residues they process. The final product is a solid that they legally deposit in the Ponce landfill. When there is a problem and the waste generated is in sludge or liquid form, the project's services are then used. The sludge is handled in tanks with a capacity of 8,250 gallons which are dumped into trenches that are prepared for this kind of

disposal. Strong odors from the fish are prevented by adding caustic soda, which is obtained from another industry. One part of it is used to increase the pH of this fish residue garbage and prevent the issue of flies and the problem of unpleasant odors in the trenches.

There are also lubricating oils. These lubricating oils are stored in a reservoir which is in fact an anaerobic reactor where they are anaerobically biodegraded. In this case, this is to keep any metal that is contained within this waste from seeping into the ground; this reservoir's pH is maintained at high levels, once again using caustic soda. The amount of caustic soda added is small since the goal is not to reach a pH so high as to kill the bacteria. It is good to have a pH of 9, maybe 10, which is a pH where the bacteria can acclimate and it prevents any metal that may be contained in this waste from transforming into its ionic state and moving into the ground. Of course, this is an extra precaution since so far no potable aquifer has been found at 100 feet deep that could be contaminated by these metals. (See Section 11-3)

Electroplating system garbage is also handled. This particular waste is in the form of sludge that possesses dangerous, contaminating heavy metals such as chromium, copper, and zinc. The only precaution that must be taken with them is to ensure that they do not make it to a body of water that could be used as drinking water in the future. The most important thing in their treatment is that they keep an alkaline pH to prevent

the heavy metals from transforming into their ionic state. This waste is deposited on the ground and buried in the form of a sanitary landfill or disposed of in drums.

Approximately half of the waste is received in drums and the other half arrives in heavy industry trucks. In the case of the drums, these are submerged together with the waste into a hole that is already prepared. In the case of the tanks, the refuse is deposited in the evaporation pond where caustic soda is added, ensuring that it is kept with an alkaline pH.

Although to a lesser degree, there are also solvents, such as alcohols, acetones, dichloromethane, etc., which are dangerous solvents and some of which are categorized as toxic. For example: dichloromethane is classified as toxic. These solvents are added to the reservoir where they are anaerobically biodegraded, completely eliminating the danger that this waste may pose, whether due to their attributes as an irritant or their volatile condition, or due to their condition as toxic waste that can be damaging to health.

In the Safety Manual of the project under analysis a breakdown is provided of the attributes of each of these kinds of waste. (See Addendum 6)

This is how the waste from this project is disposed of.

Tables 1.1. a. 1, 1.1. a. 2, and 1.1. a. 3 below include the amounts of industrial waste generated in Puerto Rico, the disposal method, and the specific quantities handled by the project that is the subject of this document.

**AMOUNTS OF INDUSTRIAL WASTE
GENERATED IN PUERTO RICO IN 1979
PER THE ENVIRONMENTAL QUALITY BOARD**

Industry Type	Total Environmental Quality Board			Subtotal & Percent Handled By Servicios Carbareón, Inc.		
	Gal/Year	Tons/Year	Yds ³ /Year	Gal/Year	Tons/Year	Yds ³ /Year
Chemical	792,029.4	10,105.60	- - -	2850 (9.4%)	3.6 (0.04%)	- - -
Pharmaceutical	1,685,404	8,880.73	44652.8	62,404 (4%)	- - -	- - -
Petrochemical	85,386,000	6,831.56	24,547.0	300,000 (4%)	- - -	- - -
Metallurgic	143,133	7,940.60	861.0	42,900 (30%)	- - -	- - -
Electrical & electric effects	2,176,901	404.00	6,240.0	- - -	- - -	- - -
Scientific Instruments	861.883	170.90	- - -	- - -	- - -	- - -
Paper & similar products	10,800	- - -	- - -	- - -	- - -	- - -
Textiles	11,440	26	- - -	- - -	- - -	- - -
Paints	19,640	3.37	240.0	- - -	- - -	- - -
Miscellaneous	660	12.06	2,825.3	- - -	- - -	- - -

Data Source: Environmental Quality Board
Report "Industry Type and Waste Amounts"
Reviewed - 1979

Table - 1.1, a. 1

**ADDITIONAL AMOUNTS OF INDUSTRIAL WASTE
GENERATED IN PUERTO RICO IN 1979
NOT TABULATED BY THE ENVIRONMENTAL QUALITY BOARD**

<u>Industry Type</u>	<u>Gal/Year</u>	<u>Yds³/Year</u>
Chemical	858,500	
Pharmaceutical	594,880	
Metallurgic	85,940	
Foodstuffs	400,000	
Electricity Generation		6,000
Miscellaneous	100,000	

Data Source: Operational Records
Servicios Carbareón
1979

Table - 1.1. a. 2

BREAKDOWN OF WASTE AMOUNTS HANDLED BY THE PROJECT ACCORDING TO DISPOSAL METHOD

Industry Type	Disposal Methods and Amounts	Total
Metallurgic	Evaporation + Sanitary Landfill (128,400 gals)	128,400 gals
Pharmaceutical	Evaporation + Biodegradation (618,400 gals) Evap. (30,000 gals)	648,400 gals
Pharmaceutical	Chemical Filling (8,880 gals) drums	8,880 gals
Chemical	Chemical Filling (306,900 gals) drums Evaporation + Sanitary Landfill (554,450 gals) (15% solid)	306,900 gals 554,450 gals
Petrochemical	Biodegradation (300,000 gals)	300,000 gals
Foodstuffs	Biodegradation (400,000 gals)	400,000 gals
Elec. Generation	Sanitary Landfill (6,000 yds ³ /year)	6,000 yds
Misc. (Oils & (septic tanks)	Evaporation & Biodegradation (100,000 gals)	100,000 gals

Data Source: Operational Records

Servicios Carbareón, Inc.

1979

Table - 1.1. a. 3

e. Methods for Waste Disposal

1. Cultivation Method

The final disposal of substances that may or may not be toxic and dangerous is done in three (3) different ways at this landfill with the goal of achieving efficient, safe, and economically viable disposal. (See Fig. #2)

One of them is the application into the grounds of substances that are biodegradable and that do not present risks by being exposed to the elements of the weather. For this purpose, plowing equipment is used to efficiently mix the applied substance with the soil and to provide aeration for the biodegradation of these substances. Currently two (2) areas measuring 1 and 1.5 “cuerdas,” respectively, are operated in this manner.

The cultivation method in the ground to dispose of waste entails several steps: the application of waste along the surface of the soil, mixing the waste with the soil or the surface to aerate the mass and expose the waste to the soil’s microorganisms. Sometimes adding nutrients or other conditioners to the soil periodically is highly beneficial and sometimes necessary to maintain aerobic conditions. This distribution method is also known by the names of land spreading, land farming, soil incorporation, as well as other names.

The cultivation method on the grounds is being used

Locations of Disposal Areas"



more and more as an alternative to conventional waste disposal practices. The soil is a natural environment for the degradation and deactivation of many kinds of waste by means of complex physical, physiochemical, chemical, and microbiological processes. The cultivation method on site is a technique by which refuse is mixed in the soil to promote these processes, especially microbial decomposition for the organic parts. Properly managed, the process can be repeated over and over again on the surface of the disposal site. In practice, the substances are transported directly to a treatment site or storage location until they make it to the disposal area. Sludge is then applied to the soil in the form of a shower, spilling them or absorbing them. The site's field is then plowed by conventional methods using equipment common to farms.

The disadvantages of cultivation on the site are the use of relatively large plots of land, the exposure of the waste to the atmosphere, and the direct impact on the vegetation that may be growing at the disposal site.

Potential cultivation methods on lands have caused many industries and private disposal companies to implement pilot programs or complete development programs. Many are studying the concept. The results from studies point towards a the potential application of on site cultivation as an alternative to conventional

disposal of sanitary landfills, incineration, or storage for certain types of waste although it should not be believed whatsoever that this method is a one-stop shop for the generators of industrial waste.

The industries that produce waste considered to be compatible with the on site cultivation method are the following:

- food and sanitary products
- finished textiles
- wood preservation
- paper and similar products
- non cellulose organic fibers
- medicines
- soaps and detergents
- organic chemicals
- petroleum refining
- paints
- tanning (skins)

The adaptation of an industrial waste product for the on site cultivation method depends on attributes such as: concentration of components in both soluble and insoluble forms, the density of solid waste, pH, sodium and other salts content, flammability, and volatility. The local climatological conditions may affect the feasibility of using this disposal practice. Excessively high humidity can impede the transfer of oxygen to the soil's microorganisms, making the

waste degradation slower. Additionally, it is difficult from an operational perspective to mix waste in muddy soils. The establishment of a layer of vegetation can improve disposal practices by absorbing any excess of nutrients and water. If there is no appropriate information on hand concerning the waste, as an approximation for determining its adaptability to the cultivation method, one can use the guides proposed for loading heavy metals for sludge from municipal treatment plants to the ground.

Among the industrial sludge applied to the soils, petroleum refining waste products have been the most common. The degradation ratio varies, depending on the climate, the petroleum contained in the soil, and its fertilization. The types of disposed oils used in soil cultivation include: cleaning of crude oil, emulsions, oil separating muds, and other methods of cleaning and maintenance. The mud is watered on the site to a depth of 3 to 8 inches with a heavy machine and is then mixed with the soil. The plowing interval for aeration varies from once (1) a week to twice (2) a year.

Loading substances that can be applied depends on the attributes of the refuse in question. Some of the important parameters are: biological demand for oxygen, total dissolved solids, content of heavy metals, presence of soluble salts, etc. The waste can have a wide range of different characteristics to be compatible with the cultivation method on the

site. The important aspect is the texture and drainage of the soil used.

At the moment, the majority of the states have no regulations to control the method of applications of waste to soils based on the concentration of heavy metals or of other toxic substances contained in them. Until new proposed regulations are in use, the criteria to be used must be enacted by the Federal Environmental Protection Agency for Sanitary Landfills in general, taking into account the spirit of the new aforementioned regulations.

2. Chemical Filling Method

Chemical filling is used when the substance is not biodegradable. There are two (2) different forms of chemical filling for an industrial landfill. One is the disposal of substances contained in drums or other containers that provide the safety of containing the substance while the other is the disposal in trenches whose floors are protected by a material that does not allow the substance to percolate into the soil. Each one of these forms is used depending on the type of waste and its physical state. Generally, liquid substances are disposed of in closed containers and those that are solid or silty are disposed of in trenches. In this project there is an area of chemical filling in drums in use with a capacity of 12,000 m³ (17,000 drums) approximately. There are also chemical filling areas with trenches in use with a potential capacity of approximately 5,000 m³.

a. Disposal in Trenches

Disposal in a landfill of chemical waste residue offers an economic alternative to the industry that at the same time entails a low negative impact on the environment in general. There are certain precautions in the acceptance of waste for disposal and operational norms that must be followed to ensure minimal adverse effects on the environment. Some chemical waste entails a potential pollution problem for bodies of water since these can seep through the soil and reach the layer of water located in the subsoil with the subsequent detrimental effects in the quality of this water.

Other possible problems that it could cause are: fire from improper handling of flammable substances, problems with offensive odors and the generation of gases that constitute possible air pollution problems.

The criteria to evaluate the viability of disposal at a fill site of chemical waste include: degradability, odor potential, flammability, and the ease of chemical reactions.

Assuming that the waste is acceptable for disposal in a fill system, the design of the landfill must ensure that there will be no significant adverse effect on the environment. The factors to be considered are: emission and production of gases, percolation of

soluble products, subterranean water currents, runoff, transportation emissions and waste application.

The basic mechanisms from which underground water pollution may occur, wherever they are, are: direct vertical percolation of waste, direct horizontal percolation, the transfer by diffusion and convection of gases produced randomly, and may affect together or each one may act individually to affect the quality of such subterranean water. The retention or scattering of any particular contaminant is determined by the dominant climate, the geological shape, and the hydrological conditions at the site of the landfill.

The active chemical waste can become innocuous in a fill system by means of processes of attenuation, filtration, microbial action, absorption, and ion exchange. To facilitate these mechanisms, sufficient time and contact with the chemical waste in the soil and any other solid waste is necessary. The size of the granule and the non-saturated depth of the fill help to determine how long it must remain there.

The absorption capacity of the solid waste and of the soil influence the contact time of the contaminant and also represent a treatment mechanism in and of itself. The greater the non-saturated depth, the greater the absorption capacity

of the fill system due to the filtration of the water making contact with a mass of waste and soil, which also positively affects the biological treatment. The potential to repeat aeration of the active biological zone on the fill surface, once the filtration has ceased, is also influenced by the non-saturated depth of the fill. Adequate drainage of the non-saturated area and of the biologically active area on the surface is necessary to ensure optimal retention time for the biological treatment and to avoid restricting the aeration of the active area.

b. Disposal in Drums

With the use of waste that cannot be treated in the aforementioned manner due to its chemical and/or physical nature, a somewhat different fill method is recommended. In these scenarios, mostly when biodegradability is difficult, the waste material must be sealed off to avoid contact with the soil and subsequent penetration of possible aquifers in the disposal area. The most practical and economical way currently to seal off is by using 55-gallon capacity metal drums. These drums are buried in the shape of gallery cells. Each gallery of drums is formed by rows of drums that contain waste of a similar chemical nature. There is a gap of clay-like material to separate the cells

of drums and allow the other industrial waste with different chemical profiles to be buried. At all times the objective sought is to avoid mixing the types of waste that could react among each other dangerously for the environment. On the other hand, some waste types do react to each other, and result in a form of stable chemical compound that has to be stored in the same gallery; for example: acids and alkalines.

The space in the ground for depositing drums containing chemical waste must be located in a higher area of the landfill, free from runoff and completely sealed. In the case of the landfill operated by Servicios Carbareón Inc., these requirements are fulfilled and also the amounts have been placed in an area where there are natural clay deposits. This material, clay, provides even greater safety to the drum burial area thanks to its impermeable attributes.

Drum handling is simple. Essentially there are two (2) ways to handle drums. One is to receive the drum on a platform. These are loaded onto platforms by forklifts at the different factories where they are picked up and when they arrive at the dumpsite they are lowered from the platform using a loader and are placed in the space in which they will be buried. The other way is to receive the waste material in tanks and empty them into 55-gallon drums. From there they are buried in the ground using the aforementioned method.

c. Available Filling Material

It has been calculated that there are approximately 500,000 cubic meters of fill available at the project's estate. This is sufficient to operate the dumpsite for more than 20 years at the same rate of growth as in 1979 in terms of available filling material. The fill is used in the cultivation methods, chemical filling with drums, and sanitary chemical filling.

3. Evaporation Pond Method

Another method that is very much connected to that of application in the soil and that is used in the project is that of evaporation ponds. In these reservoirs, taking advantage of the high rates of transpiration together with very scarce rainfall (See Sect. 11-1), substances that are liquid solutions are stored so that the water evaporates. Once it has, if the substance is biodegradable, this is applied to the soil with the aforementioned cultivation method. Within the project there are two (2) such low-lying reservoirs of this kind marked "1S" and "2S", as shown by Fig. #2. They have a capacity of 800,000 and 1,700,000 gallons respectively.

For non-biodegradable substances (caustic and others) there is another reservoir with a capacity of 530,000 gallons (1L). In this case, once the water has evaporated, the dry remnants are buried in a fill two feet deep. This is the so-called sanitary chemical fill and should not be confused with the cultivation method or with the municipal Sanitary Fill.

f. Analysis for Determining the Disposal Method

The disposal method for each type of waste handled is chosen after a thoughtful analysis of the chemical and physical characteristics of the refuse.

The analysis starts with a visit to the place where the refuse is generated. During this visit, the industrial process that generates the waste is discussed. This is the most important part of the analysis because this how what chemical substances, as well as the main components of the waste material, can be present in small quantities.

After forming a clear idea of the primary and secondary components of the waste, an analysis of these components is ordered from a competent laboratory. Given the variety of the analyses, it is occasionally preferable that the same organization do the analysis at its own laboratory. The majority of industrial firms boast laboratories specially designed for the type of process that they manage. Thus, the laboratory instruments are calibrated and maintained in such a way that the chemical analyst acquires special skills in that firm's particular types of analyses.

Once the composition of the waste has been quantified, the disposal method is selected. It is at this phase that the amount of waste to be generated has an impact on the landfill's facilities. If it were necessary, special sections of the site would be used to construct and develop safe disposal for the waste. For example:

the sludge with metal waste from the electroplating processes is not stored at existing evaporation ponds. Instead a special reservoir is built with clay-like material at the bottom for this type of waste material. This reservoir will be constructed, not in the area for soil applications, but rather in the chemical fill area.

To maintain a detailed record of the landfill's activities, each substance deposited is noted in a book. This book contains information that reveals who generated the waste, what quantity was disposed of and on what date, how it was disposed of, and where exactly the final disposal location is. This is the Operation Record of the project.

g. Specific Data on the Project's Disposal Processes (See Table #V #1.2.g.1 at the end of this article)

Biodegradation, combined with the waste derived from different chemical processes, is implemented in the reservoir in the soil application area (Reservoir 1S). A schematic drawing of the operation is as follows:

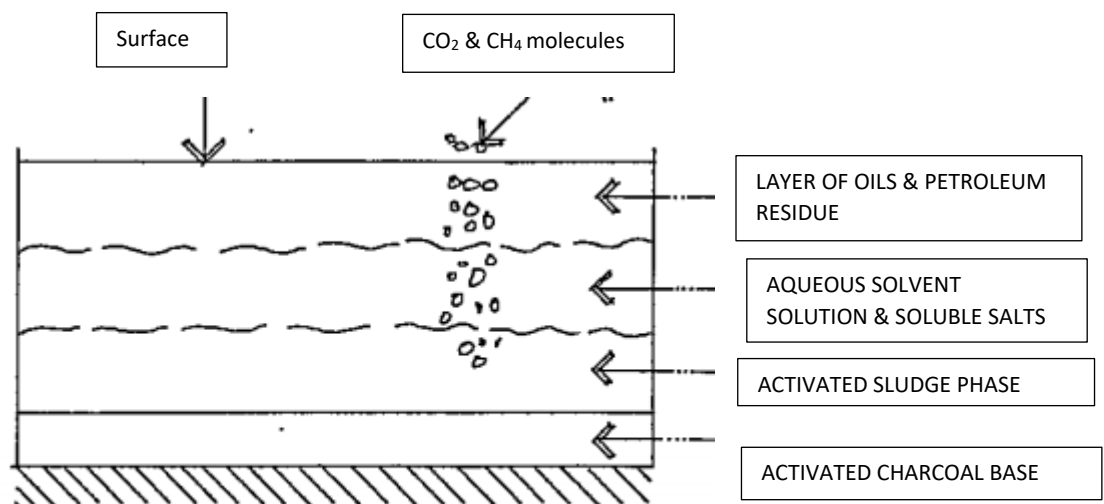


Fig. 2A

The biodegradation process converts the organic material to the gases of carbon dioxide, methane, and stable solid material by means of the use of bacteria. The bacteria use the organic material as a source of energy. In our case in particular the cultivation of bacteria is divided into two (2) stages: the anaerobic bacteria on the plant submerged in the reservoir and the aerobic ones on its surface. The nutrients used to preserve sufficient cultivation of bacteria for biodegradation are the fish residue (that are rich in phosphorous) and residue from septic tanks (rich in nitrogen).

The control method is visual, and in it, the amount of bubbles present on the surface of the reservoir is inspected. The mix of organic substances is varied and the possible stoichiometric calculation of the organic carbon removed would be quite hard to do with the usual calculations. The qualitative control is considered appropriate in this case because there is no discharge, properly defined, and the next step for this process is the application of this material, partially degraded, on the soil for its final degrading.

Biodegradation, combined with the reservoir, has two (2) purposes: to obtain a homogeneous mixture of the substances before being applied to the soil and the removal of excess water, to an evaporation pond, to make the soil application quicker without accumulating liquids on the surface. The homogeneous mixture allows

the bacteria to become acclimated in the reservoir, achieving faster degradation.

During 1979 the quantity of 300,000 gallons of petroleum residue, in addition to close to 250,000 of various organic substances were biodegraded in this reservoir. The initial layer of petroleum residue was more than three (3') feet deep. Currently, 6 months after the project started, only a superficial layer of oil now exists in the reservoir.

One important parameter to allow the use of qualitative control methods in this biodegrading reservoir is time, since given that there is no outflow from this process to a recipient body of water, it allows for the needed flexibility in the use of qualitative methods to control a process. Currently only one reservoir of this kind exists in the industrial fill site and the need to construct a new one in the next year is assumed. This is due to the demand increase for this type of disposal service in particular. With only two (2) reservoirs of this kind, the industrial landfill can dispose of organic biodegradable waste, because its usage is temporary for each load of substances and transported substances are loaded again once the partially degraded material is applied to the soil.

The management of inorganic material originating from the Loctite Puerto Rico Inc. company, was carried out in 1978 and 1979 using the sanitary fill in galleries.

The waste was handled in 55-gallon capacity metal drums. Given the high water content in the waste and alkaline and inorganic nature of the liquid, an assessment of the alternative used was conducted. A disposal method arose from the evaluation that was acceptable to the environment surrounding the industrial landfill and convenient for the use of planning it. During 1979, around 8,000 metal drums were handled. These drums, upon being buried, occupied a volume of approximately 4,354 cubic yards in the landfill. Since the waste was completely compatible with the other waste materials buried in the gallery, this disposal was considered appropriate. But when the alternative of evaporating the water before disposing of the sanitary fill was presented, it was calculated that the use of the site would be only 1,371 cubic yards, because evaporation eliminates seventy percent (70%) of the water contained within the waste. Construction of the reservoir proceeded with the walls and a base of compacted clay for such purposes. The reservoir has been functioning since the fall of 1979 with satisfactory results. It can be accessed by means of a ramp constructed on compacted clay. The reservoir is located at the foot of a hill in the area of the sanitary landfill, away from runoff, and access roads to the landfill. It is labeled as "Laguna 1L."

To permit the continuous use of the landfill by the company Loctite de Puerto Rico, a second evaporation pond

is projected to be built. This way the solids accumulated at the bottom of the reservoir can be removed and deposited in the sanitary landfill. To do so, the sanitary landfill area will first be waterproofed with a layer of compacted clay, in accordance with the regulations proposed for dangerous substances and the results of the compaction curves.

A second and important reason to vary the disposal method of this material is its alkaline characteristic. The burial of drums is a final form of disposal. The use of evaporation ponds makes it possible to use the material to:

a. - neutralize inorganic acids, such as hydrochloric acid, acetic acid, sulfuric acid, etc.

The chemical reaction is:



Both the acid and the alkaline base, are corrosive and dangerous products. When they react to each other, the product is a salt and nontoxic to the environment. The use of these acid-base reactions allows the final disposal of inorganic acids at the industrial landfill in a way that's safe.

b. Keep metallic sludge at a high alkalinity

to prevent heavy metals from changing their ionic state and moving into the ground.

- c. Detoxify dangerous substances such as nitrocellulose, to allow for their biodegradation.

Sanitary landfills in galleries allow the best use of the soil by burying substances sealed in drums into the same space and with compatible attributes. The space currently (in use) has a capacity of about 17,000 drums at 55 gallons each. This hollow space (Cavity 1C) has a service life of two (2) years and occupies a volume of around 10,000 cubic yards of soil. The construction design permits waste disposal at multiple levels. When waste disposal with drums at Loctite of Puerto Rico was discontinued, the service life of the space increased. According to an estimated demand of 5,000 drums per year, for 1980 and increasing by 10% for the following years, the capacity of future hollow spaces is estimated at 92,651 drums for the next ten years of operations.

<u>Year</u>	<u>Projection/Year</u>
1980	5,000
1981	5,500
1982	6,050
1990	12,968

These 92,651 drums will be placed in hollow spaces of 20,000 drums each, with the labels Cavity 1C, 2C

TABLE OF WASTE AND DISPOSAL (1979)

<u>Company</u>	<u>Waste Type</u>	<u>Annual Amount</u>	<u>Handling</u>	<u>Disposal Type</u>
Western Fher Laboratories	Suspension of organic Products, solids in water & inorganic salts	83,120 gals	Tanker truck	Combined biodegradation
Loctite Puerto Rico	Alkaline solution (68.5% water, 136% NaOH, 2.09% NaCl, etc)	511,500 gals	Tanker truck	Evaporation & sanitary landfill
Roche Products Inc	Inorganic & organic salts	7,315 gals	Metal drums	Gallery sanitary landfill
	Organic solvents	13,970 gals	Metal drums	Combined Biodegradation
	Acetic acid	1,650 gals	Metal drums	Chemical neutralization + evaporation + sanitary landfill
	Leftover solvents	165 gals	Metal drums	Combined Biodegradation
Travenol Laboratories	Aqueous dextrose solution (95.6% water, 4.4% dextrose)	408,000 gals	Tanker truck	Evaporation
Arbrook Manufacturing	55% activated charcoal, 13% Glutaraldehyde, 32% water	24,000 gals	Tanker truck	Combined Biodegradation
General Electric Controls	Metallic sludge (15% solid, 85% water)	52,800 gals	Metal drums	Gallery sanitary landfill
	Lubricating oils & Solvents	10,000 gals	Metal drums	Combined Biodegradation

*Please see attached tables that describe and define in detail.

Data Source: Operational Records - Servicios Carbareón, Inc.

1979

Table 1.2.g.1

<u>Company</u>	<u>Waste Type</u>	<u>Annual Amount</u>	<u>Handling</u>	<u>Disposal Type</u>
General Electric Gepol	Metallic sludge (15% solid, 85% water)	42,200 gals	Tanker trucks	Evaporation + sanitary landfill
Productos West- Inghouse de	Hydrochloric Acid	1,650 gals	Plastic drums	Chemical neutralization + evaporation + sanitary Landfill
	Lubricating oils	550 gals	Metal drums	Combined biodegradation
Puerto Rico Pigments	Plastic bags, poly- propylene filters, organic ink filters	48,400 gals	Metal drums	Gallery sanitary landfill
Wang Puerto Rico	30% welding oil 60% solvent, 10% flux	1,860 gals	Metal drums	Encapsulated in drums
Mitel Caribe	30% welding oil, 60% solvent, 10% flux	2,000 gals	Metal drums	Encapsulated in polypropylene Drums + gallery sanitary landfill
Abbott Chemicals, Inc.	Acetone & dichloro- methane	76,267 gals	Plastic drums	Gallery sanitary landfill
Millipore Corp.	Aqueous solution containing nitrocellulose, cellulose acetate, acetone, salbutamol, ethanol, glycerine, & water	12,375 gals	Metal drums	Denitrification with sodium hydroxide solution + segregated biodegradation
Vicks Merrell	Synex aerosol nasal residue, 32% water	33,000 gals	Metal drums	Evaporation

Table 1.2.g.1 (con't)

<u>Company</u>	<u>Waste Type</u>	<u>Annual Amount</u>	<u>Handling</u>	<u>Disposal Type</u>
Searle & Co.	Sodium hydroxide Aqueous solution & hydrogen sulfide	8,800 gals	Metal drums	Segregated sanitary landfill
SK & F Lab. Co.	Activated charcoal, water, traces of heavy metals	288,000 gals	Tanker trucks	Evaporation + combined biodegradation
National Packing Co.	Fish residues (tuna) & water	930,000 gals	Tanker trucks	Evaporation + segregated biodegradation
General Electric Protective Devices Inc.	Metallic sludge 15% solid, 85% water	33,000 gals	Tanker trucks	Evaporation + sanitary landfill
General Electric Wiring Devices Inc.	Metallic sludge 15% solid, 85% water	16,500 gals	Tanker trucks	Evaporation + sanitary landfill
Automotive Service Stations	Used motor oil & dirt	36,000 gals	Tanker trucks	Combined biodegradation
Septic Tanks	Human excrement	30,000 gals	Tanker trucks	Combined biodegradation
Electric Energy Authority	Metallic sludge 50% solid, 50% water	570,979 gals	Dump trucks	Sanitary landfill
Dade Diagnostic	Bottled (sealed) laboratory reagents	900 gals	Metal drums	Gallery sanitary landfill
Caribbean Gulf	Petroleum waste	150,000 gals	Tanker trucks	Combined biodegradation

*Activated charcoal increases the biological activity in the degrading of organic substances.

(con't)

<u>Company</u>	<u>Waste Type</u>	<u>Annual Amount</u>	<u>Handling</u>	<u>Disposal Type</u>
Eli Lilly and Company	Dextropropoxyphene	21,525 gals	Fiber drums	Segregated biodegradation

Notes:

1. The terms “sanitary landfill” and “chemical sanitary landfill” are used with the same meaning in this document and refer to the same disposal method of a non-biodegradable substance from which water has been extracted by means of evaporation or another method and is buried inside a material with impermeable attributes and covered with a layer at least two (2) feet deep.

2. Servicios Carbareón, Inc. has informed the Environmental Quality Board of the detailed disposal of all waste in the project including the type, method, and disposal area.

*The product of several years was destroyed, it is not managed periodically.

etc., at the sites already highlighted in the development plan. The amount of land required to have this number of drums is available on the lot currently used by the industrial landfill.

The attributes that allow the disposal of several chemical products in the common hollow space are as follows: chemical stability, absence of flammable substances and/or explosives, medium or high alkalinity, a solid or gelatinous physical state, appropriate sealing, etc.

Segregated biodegradation of nitrocellulose waste is similar to a reaction with sodium hydroxide to detoxify nitrocellulose and eliminate its characteristic of tuna refuse and lubricating oils in an aqueous medium.

In the same way, dextropropoxyphene is mixed with fish residue and oil to modify its nature as a pharmaceutical tranquilizer and expedite its biodegradation.

h. Reception and Processing of all Waste

The waste is analyzed in a laboratory in terms of its chemical composition such that it can be disposed of correctly. This is done before it is transported from the creator (industry, business, etc.) to the project. This analysis is generally performed in one of at least five laboratories in Puerto Rico capable of this kind of analysis. These are:

1. **Omni Research Laboratories - San Germán**
2. **Department of Chemistry Laboratory of
the University Facillites of Mayagüez – Mayagüez**
3. **Langston Laboratories, Inc. - Cataño**
4. **Caribtec Laboratories, Inc. - Hato Rey**
5. **Arnold Green Testing Laboratories of Puerto Rico
- Hato Rey**

The creator delivers beforehand to Servicios Carbareón, Inc. (SCI) the result of this analysis. SCI then develops plans for the disposal of the waste in question, as the case may be. Once this process has been completed and after the creator has received the disposal permit, the execution of the disposal then proceeds.

The waste is then shipped in its entirety by tanker trucks, platform trucks, and dump trucks that are the property of Servicios Carbareón, Inc. A license is required to transport this type of material on the highways of Puerto Rico and Carbareón possesses one of these licenses. All clients are strongly recommended to use the transportation offered by Servicios Carbareón, Inc. at all times to wield greater control over the waste that end up in the landfill and of the waste received from different industries. This will allow for greater control over the management of waste materials from the start.

For the most part, the refuse is processed in

some way. The organic waste is handled mostly in tanks with an 8,250 gallon capacity, transported and dumped in reservoirs where they biodegrade. There are waste products that are mostly composed of water, say 60% or 75%, sometimes even up to 90%. This waste is deposited in reservoirs to evaporate their water content. The water does not percolate in any measureable amount into the soil since this has impermeable characteristics like the adjacent region. The water evaporates, which is a treatment technique with very high acceptance within environmental regulations. The waste will be buried in drums, contained in drums, which do not receive any type of special treatment except to verify their alkaline state. They come directly from a platform with a capacity for 80 drums and are placed in the different relevant cells or galleys to be buried.

Any waste that has attributes that allow its biodegradation, but that also has other traits that impede said biodegradation or make it more difficult, is treated in some way prior to the biodegradation process. An example of this would be the waste that, due to its nature, requires a very long time to biodegrade. The manner of expediting this biodegradation could be by means of mixing it with another kind of waste that is easily degraded (such as fish refuse) or with other waste that does not have flammable or corrosive characteristics that in some way, shape, or form expedite biodegradation.

i. Liquids from Leaching

These are liquids that penetrate the soil layer originating from the waste that is disposed of at their final stage in the landfill. These liquids are considered to not be, or should not be, in quantifiable amounts given the characteristics of the waste at hand due to their stable chemical nature. It is important to underscore that the waste is always deposited in the ground in alkaline form. At no point does it have acidic characteristics that would allow the salts to dissolve and move through the soil. These lixiviation liquids, if they existed, would be measured by means of four (4) sampling wells at a depth of 30 feet to obtain samples and they would be identified by way of measurements of the amount of total organic carbon that would exist at that level, which is 30 feet deep for the sampling wells, and the quantity of metals, of metal ions, that are encountered at that depth.

Additionally, if those liquids did exist, the nature of the clay-like soils does not allow seepage through the soil (See the section on Geology).

j. Proposed Sampling in the Project

The landfill operated by Servicios Carbareón, Inc., in the Encarnación Neighborhood is located in a dry area, and where soil samples indicate that there are no apparent bodies of water at a depth of 100 feet. However, and given the need to be aware at all times

of any indication of movement, whether horizontally or vertically, or chemical substances, a drilled system is foreseen with monitoring wells in strategic locations to check and control this problem, if it were to exist.

To sum up, each disposal section has a vertical monitoring well. These are drilled to a depth of 30 feet. To acquire the sample, water will be inserted into the well, and then a sample of wet soil will be extracted that will be sent to a competent laboratory for its corresponding analysis. Also plans are underway to drill wells to a depth of 5 feet to check lateral movements. These will be located towards the cardinal direction that defines the border of the land that's the lowest.

Samples will be taken at intervals of six (6) months and the results will be recorded in a book that will maintain all of the relevant information for an indefinite period of time.

It is planned, additionally, to have an on site laboratory where simple analytical tests can be performed. Tests such as acidity and percent of insoluble solids to aid the employees manage the waste more effectively.

Specifically, the system of 30 foot sampling wells functions as follows: 4 wells were installed to conduct the sampling to verify any type of seepage that may occur in the soil. On the 4 borings made at 100 feet deep to try to locate any body of water

70 feet of the 100 foot hole were filled, with 3/3 stone, gravel stones, and the other 30 feet had a PVC tube 3 inches in diameter installed. The last 4 feet of this tube are perforated with a large number of holes measuring $\frac{1}{4}$ of an inch each and the other 26 feet are a solid-walled PVC tube. PVC tubes were used because if there was any kind of pollution, any type of migration in the soil, it would be of heavy metals and by choosing a type of plastic material for the tube any kind of interference is prevented with the tube's metals. As there apparently is no aquifer of any kind at a depth of 100 feet, at 30 feet it is very unlikely to find any type of humidity. Since these wells are kept covered to extract samples, the tube has to be emptied of a sufficient amount of water so that the tube fills up to the surface. After this water penetrates the ground on the last 4 feet of the tube, in other words, at a depth of 26 out of 30 feet, at that depth any metal and other particles present are expected to dissolve in the water and could be detected by taking a sample. The method with which the samples will be taken is as follows: the tube fills with water to the surface level, the water is expected to penetrate the soil and/or evaporate, the water level inside the sampling well is measured using a cord with knots for every foot of distance and a cork at the very end. With this method, every time that the cord is pulled through the sampling tube (when it gets to the water level inside of the well) the number of feet

can be counted and the level of the water that was added will become known. When the water has made it to the last 4 feet of the well then one proceeds to insert a glass bottle with a piece of lead tied to the bottom on the outside in order to be able to extract the sample. If there is any suspicion of the lead having migrated, then a rock or some type of material like a piece of steel covered in PVC glue as a weight will be used to force the penetration of the bottle inside the water and recover the sample. This way it is ensured that the water inserted into the well has penetrated the soil and that any kind of metal that may be in the soil will prefer the watery, metal-free medium, the test will be an effective means of detection. We apply the principal that substances are always naturally transferred from areas of greater concentrations to areas with lower concentrations. In other words, this is a basic principal of chemistry (belonging to Chatalier) where all systems naturally try to achieve equilibrium. In this case, the equilibrium would be to obtain the same concentration levels within the water inside the sampling tube as the soil that surrounds it. The first round of samples will be taken in May of 1980. (Table #1.2.i.1)

Since materials with metals are not available at all of the landfill's disposal sites, the analyses that are to be done of the 4 samples taken will vary as follow. In the well that sits close to the anaerobic degradation reservoir, migration in the amount of organic carbon will be looked for. This analysis will confirm for us whether

SAMPLING PROGRAM FOR WELLS

<u>Type of Sampling</u>	<u>Well #1</u>	<u>Well #2</u>	<u>Well #3</u>	<u>Well #4</u>
TOC	X	X	X	X
pH	X	X	X	X
Copper Ion	X	X	X	X
Chromium Ion	X	X	X	X
Total Mercury	X	X	X	X
Zinc	X	X	X	X

Table # 1.2.i.1

there is any movement of organic material through the soil, which is highly improbable but not impossible, and also any other material that may be contained within this waste that is dumped into that anaerobic degradation reservoir. Metals are the most precise form for such a contaminating migration since they can be detected at extremely low concentration levels such as the level of parts per billion. Detecting organic material is much more difficult and the most widely accepted way to do so is by way of a total organic carbon analysis (TOC) since this one is the more precise when it comes to organics. The two other common parameters, which are used in practice, are the BOD and the COD, but these two parameters are not as precise in the laboratory as the TOC. Drastic changes in the way that pollution is measured have taken place, not only for the ground, but also for water and air. The 4 fundamental parameters in the past were OBD, TSS, pH, and fecal coliform bacteria. Currently only pH has remained as a primary parameter, and BOD and TSS have been replaced by metals and organic products in detail. For example, analyzing the amount of benzene, that of acetone, oils and grease, etc.

We propose to conduct an analysis, as mentioned before, as soon as the Environmental Quality Board approves the method. What is being proposed is to regularly conduct an analysis every 90 days during the first year to establish base concentrations.

From there onward, a period of time would then be chosen depending on the levels found. Experience tells us that what is most likely is that the periodicity will be every 6 months to perform the analysis. Anything more frequent than that would just entail laboratory costs that would not provide any additional details, but establishing the base concentrations is critical. For example, if it is discovered in the first round of sampling that there is too great a difference between one location and another for any given parameter, say with metals, a second immediate sampling would be needed to verify these levels of metals. If it is discovered that the correlation of metals in the different locations has no fixed basis, the sampling system would have to be reviewed then as well as the system for analyzing the sample in the laboratory to find where the failure is. The 4 sites at this level should definitely have levels of metals and total organic carbon materials within similar ranges, or at least, each well should have similar concentrations in 2 or 3 samplings conducted one after the other. If this is not the case and the sampling method were correct and the laboratory analysis method also were correct, then one would have to admit that there is a massive migration of material towards the property or that there are naturally existing levels of heavy metals at the site that are much greater than those that could cause the migration of metals of the waste being deposited. The amount of metals in the waste deposited are found in parts per million and if greater

concentrations are found then they definitely must be natural at that site and not being identified with the disposal of waste material at the surface. This type of analysis can only be performed after collecting the samples and analyzing the results.

We have now presented in great detail what is being proposed in terms of the plan for sampling at the dumpsite. This sampling plan is of a preventative nature. At a depth of 30 feet, with the kind of waste being handled in this project and with the type of soil material definitely no levels of pollution should be found, either in the present or in the distant future. Furthermore, if at some point in the future some type of pollution were detected, it would not be significant for a depth of 100 feet, where a body of water has still not been found and where a layer of shells was found originating from the time when the Island was volcanic, which should function as a protective layer for any type of pollution that penetrates the soil. Moreover, at that depth the natural level of heavy metals should be much greater than those being deposited on the surface.

k. Proposed Maintenance and Monitoring for the Facilities
once their Service Life has Expired

Plans are in place to continue using the sampling wells installed in order to continue conducting an analysis twice (2) a year of a possible migration of contaminants through the soil. As already demonstrated by studies, to date,

no subterranean waters exist at depths such as 100 feet. Furthermore, it has been discovered that at 100 feet there are layers of shells that belong to mountains of volcanic origin that would not allow the passage of any liquid due to this layer being too compact and firm to permit the seepage of water. But at any rate, the proposed monitoring includes continuing to use the sampling wells once the landfill reaches the end of its service life. It's noteworthy to remember that the part of the landfill used for degradation of organic materials has an unlimited service life and that the part that actually has a finite service life would be the area for burial of drums and that of chemical filling, the last of which is the one that is truly important to take care of.

I. Reuse of the Waste

At the moment, only the reuse of waste materials has been considered. This recycling of waste is in the method for the final stage of biodegradation and it completes the organic waste on the site by means of the cultivation method. That is, by means of plowing and the injection of this partially degraded material for its final degradation on the site it thus achieves fertilization. This kind of disposal and recycling are in experimental stages in several places in the United States. The reuse of waste materials could be considered in a broad sense the concept that waste in its only form is dangerous but that,

at the same time, it can provide us with facilities such as these to treat distinct but equally dangerous kinds of waste. For example, petroleum residues are equally as dangerous as the residue from solvents. But if there are remnants of heavy petroleum with a high viscosity and that mixes with solvents, then these solvents can be used to dissolve these petroleum residues somewhat, making the biodegradation of the petroleum easier since this substance has more mobility in the aqueous medium in which the degradation is taking place. On the other hand, we also have acidic waste, which is extremely corrosive and irritating, and alkaline waste likewise with the same characteristics. Upon being combined, they react and form inorganic salts, which are not dangerous for the environment. The technology is simple but effective and economically viable.

In the case of methane, it is not used since there is still no recovery technique that is economically viable for the volume currently produced and projected in this landfill.

As for the drums, once they are emptied they are washed and reused to contain grease and solvents.

It is worthwhile noting that there is waste that is received at the project that could be reused. This is the case for some solvents, like alcohols and acetones. These are not reused by industry due to the quantities of salts, and inorganic sludge that make them very tough to clean

and use again because we do not have the technology or because the technology is too expensive to be applied and which does not allow incineration for this waste to recover energy from the incineration for the same reasons. In other words, these solvent waste forms are, for the most part, used to wash metals and with these contaminants incineration is difficult since the appropriate technology does not exist to carry it out or because it requires an extremely burdensome amount of invested capital for the kind of activity undertaken by plants in Puerto Rico. It would require especially expensive technology that is not within the realm of possibilities for industry in Puerto Rico currently to be able to recover or reuse these resources. The best alternative on the horizon is the production of energy extracted from the incineration of these waste materials. But even though in theory it is a very acceptable and beneficial way to recover these resources, the quantities produced from the different plants are not enough to pay for the investment required for incineration equipment to recover energy.

The Government is considering promoting a facility that would collect all of these waste materials from the industries, be self-paying, and work to recover energy and reuse this waste that is currently completely degraded and does not produce any further benefit to the Puerto Rican community. This kind of project requires an analysis and any installation in Puerto Rico is not projected for the next five (5) years.

The type of technology that needs to be applied, as previously stated, is extremely expensive and at this time, Puerto Rican industry is not currently in a position to pay for it. The reutilization of resources is highly desirable but the technology is not cheap and is currently impractical for Puerto Rico or other countries at the same economic level as Puerto Rico. The project we analyzed will take into account at all times the reutilization of waste. If the waste that is currently completely degraded could be reused with artificial degradation such as economically feasible incineration, not only would this waste be disposed of safely, but an additional benefit could also be obtained that the community currently does not receive.

m. Inventory of Similar Existing Facilities

May it be submitted for the record that the first facility of this kind that was installed was that of Servicios Carbareón, Inc. There is no other type of facility approved by the Government for this type of activity in Puerto Rico. What is known is that the industrial waste of Puerto Rico that is currently broken down in reports by the Environmental Quality Board is ending up at some site to be disposed of in its final form. Most of this is probably going to the island's municipal landfills. One part of this waste is being dumped into the Atlantic Ocean to the north of Arecibo. Although it is legal now, this practice will have to be discontinued as of June of 1981.

The facilities that operate in Puerto Rico illegally or legally have been registered by the Environmental Quality Board and by the United States Congress. (It is possible that some waste is illegally and secretly ending up in rivers, ravines, or other sites throughout Puerto Rico.) A copy is included of the partial report from Congress about this subject entitled "Waste Disposal Site Directory" prepared in 1979. (See Addendum 1)

Servicios Carbareón Inc.'s facility has been in operation since early in 1975. It is a new facility that has been gradually developing and its greatest level of waste management was in the second half of 1979 operating case by case and acquiring individual disposal approvals from the Environmental Quality Board. In other words, each waste generator of that uses the facilities operated by Servicios Carbareón, Inc. in the Encarnación and Tallaboa Saliente Neighborhoods of Peñuelas has an individual permit.

Currently, the landfill is closed under a Cease and Desist Order from the Environmental Quality Board and the necessary paperwork is being processed to acquire a permanent operational permit.

PRELIMINARY ASSESSMENT
OLAY COMPANY, INC.
CAYEY, PUERTO RICO

PREPARED BY
ENVIRONMENTAL QUALITY BOARD
SUPERFUND PA/SI PROGRAM

DECEMBER 13, 1990

402047



SITE SUMMARY AND RECOMMENDATIONS

Olay Company Inc., formerly Vicks, Inc., is located on a three building facility at Vicks Drive, Road 753 km. 2.3, Rincón Ward at Cayey. The site is owned since 1985 by Procter & Gamble, Cincinnati and from its beginnings in 1974, it has been engaged in the manufacturing of cosmetics and health care products.

From the manufacturing activities, OCI generated only few amounts of wastes, mostly solvents from the QC Laboratory. Along with those wastes, ink is generated as well as waste waters from the Sinex manufacturing processes. The waters are pre-treated with charcoal filters to remove mercury compounds present on the preservative known as Timesoral. All the wastes and the contaminated charcoal filters are stored in drums at the Flammable Storage Cage (FSC), along with other containers of raw material. The FSC is well secure and no signs of contamination were observed or detected within the area. For these waste generating activities, Olay Co., Inc. was granted a NPDES permit for industrial discharges in 1977 and was declassified from a full generator of hazardous wastes to a Small Quantity Generator in 1984.

Waters from the treatment of Sinex wastes are disposed into the OCI Pre-Treatment plant, along with rinse/cleaning, and septic waters. The final discharge is then made into the PRASA "El Torito" WWTP in Cayey. PRASA also operated within two miles from the site, drinking water wells and surface water intakes to serve a combined population of more than 30,000 people.

OCI is located at the end of an industrial park, nevertheless, many residents live next to the north side of the plant in a well developed residential area. However, even though there is people living near some of the Olay waste management areas, security at OCI is good and only authorized personnel is able to trespass areas where hazardous substances are present.

The company has reported throughout the years a series of spills in their facilities, however, none of them have been seen to affect local resources and/or residents within the site. Major concern exists with a violation found in 1977 regarding the discharge of waste waters to a local creek without a permit,

however, there's no evidence within the EQB Water Quality Area or PRASA files, that suggest that any major damage occurred as consequence of the discharges. Based on all the above mentioned we recommend the Olay Company, Inc. site for NFRAP.

PART I: SITE INFORMATION

1. **Site Name/Alias** Olay Company, Inc. (Former Vicks, Inc.)
Street Road #735 km. 2.3, Rincón Ward
City Cayey **State** PR **Zip** 00633
2. **County** N/A **County Code** 035
3. **EPA ID NO.**
4. **Latitude** 18° 07' 47" N **Longitude** 66° 08' 33" W
USGS Quad Comerío
5. **Owner** Procter & Gamble, Co. **Tel. No.** (513) 983-1100
Street One Procter & Gamble Plaza
City Cincinnati **State** Ohio **Zip** 4502-0599
6. **Operator** Olay Company, Inc. **Tel. No.** (809) 738-2191
Street Vicks Drive
City Cayey **State** PR **Zip** 00633
7. **Type of Ownership**
☒ Private ☐ Federal ☐ State
☐ County ☐ Municipal ☐ Unknown ☐ Other
8. **Owner/Operator Notification on File**
☒ RCRA 3001 **Date** 8/14/80 ☐ CERCLA 103c **Date**
☐ None ☐ Unknown

9. Permit Information

Permit	Number	Issued/Expiration	Comments
RCRA	050451930	8/14/80	Small Quantity Generator
NPDES	0023469	1977 1980	Surface Water Discharge
Air	05890088	1989 1991	Emissions

10. Site Status

xx Active Inactive Unknown

11. Years of Operation November 13, 1974 to Present

12. Identify the types of waste units (e.g., landfill, surface impoundment, piles, stained soil, above-or below-ground tanks or containers, land treatment, etc.) on site. Initiate as many waste unit numbers as needed to identify all waste sources on site.

(a) Waste Management Areas

Waste Unit No.	Waste Unit Type	Facility Name for Unit
1	Treatment Plant	Pre-Treatment Plant
2	Drums/Containers	Flammable Storage Cage

(b) Other Areas of Concern

Identify any miscellaneous spills, dumping, etc. on site; describe the materials and identify their locations on site.

On October 2, 1990 a spill of laboratory wastes occurred at OCI when a worker, by mistake, discharged a 15 gallons mixture of pyridine, toluene, chloroform and organic solvents to the equalization tank of the Dissolved Air Flotation Unit (DAF). The accident occurred due to a misplace of the drum which also was unlabeled. The incident was detected by the company management the next morning, but it wasn't until the afternoon that the remaining waste on the DAF pit was recovered, and the discharge to PRASA stopped. Composite sampling was performed at the Waste Water Treatment Plant and grab sampling for the DAF, however, they concluded that to the low production of those days most of the spill was contained on the DAF or digested by bacteria at the WWTP.

13. Information available from

Contact Francisco Claudio Ríos Agency EQB Tel.No.(809)764-8824

Preparer Johanna Padró Agency EQB Date December 13, 1990

PART II: WASTE SOURCE INFORMATION

For each of the waste units identified in Part I, complete the following six items.

Waste Unit 1 Treatment Plant Waste Water Treatment Plant

1. Identify the RCRA permit status, if applicable and the age of the waste unit.

The OCI WWTP started operations in 1975 and up to 1977 its effluents were discharged into a local unnamed creek without a NPDES permit. The permit was finally granted that same year and discharges to the creek ended in 1982 when the WWTP was connected to PRASA.

2. Describe the location of the waste unit and identify clearly on the site map.

The treatment plant is located at the east side of the property, close to the access road and in front of the guard house. The Sinex waste water pre-treatment area is located next to the WWTP.

3. Identify the size or quantity of the waste unit (e.g. area or volume of a landfill or surface impoundment, number and capacity of drums or tanks). Specify the quantity of hazardous substances in the waste unit.

The WWTP was originally design to process a 15,000 GPD effluent; the actual daily amount was not offered by the company, although it was informed that it is variable in terms of the production.

4. Identify the physical state(s) of the waste type(s) as disposed of in the waste unit. The physical state(s) should be categorized as follows: solid, powder or fines, sludge, slurry, liquid, or gas.

All the wastes process by the treatment unit are liquids, and include sanitary, process and sinex waste waters.

5. Identify specific hazardous substance(s) known or suspected to be present in the waste unit.

The WWTP treat waste waters containing mostly detergents and grease from the manufacturing of cosmetics. The waste waters from the sinex manufacturing processes are pre-treated with charcoal filters to eliminate mercury traces.

6. Describe the containment of the waste unit as it relates to contaminant migration via groundwater, surface water, and air.

Beside the standard WWTP safety devices, such as pipping, gauges, alarms and others, the Olaj WWTP has no other special containment feature.

Ref. Nos. 15,21,35

PART II: WASTE SOURCE INFORMATION

For each of the waste units identified in Part I, complete the following six items.

Waste Unit 2 Drums/Containers Flammable Storage Cage (FSC)

1. Identify the RCRA permit status, if applicable and the age of the waste unit.

This unit was constructed from 1981 to 1982, although the notification of hazardous waste activities was submitted on August 14, 1980. On December 1982, the company request a classification to a small quantity generator, that was granted on December, 1984. Officials from OCI were not able to indicate where the company stored their wastes before the construction of the actual storage cage; in other words, from 1974 to 1982.

2. Describe the location of the waste unit and identify clearly on the site map.

The Flammable Storage Cage (FSC) is located at the north side of the plant, outdoors, between buildings A and B.

3. Identify the size or quantity of the waste unit (e.g. area or volume of a landfill or surface impoundment, number and capacity of drums or tanks). Specify the quantity of hazardous substances in the waste unit.

The FSC covers in cement, an area of approximately 20' x 40'. The cage can store more than 50 drums, however, due to company policies, it never holds large quantities of containers at a same time in order to do not obstruct the entrance to the area or restrain the movement of workers within.

4. Identify the physical state(s) of the waste type(s) as disposed of in the waste unit. The physical state(s) should be categorized as follows: solid, powder or fines, sludge, slurry, liquid, or gas.

Except the charcoal filter contaminated with mercury from the treatment of Sinex waste waters, all the other wastes present on the storage unit were liquid.

5. **Identify specific hazardous substance(s) known or suspected to be present in the waste unit.**

Both, raw material and wastes from the plant manufacturing processes are stored in this unit. Among the wastes present during the day of the inspection where ink, charcoal filters with mercury and spent solvents. Other hazardous substances present where raw materials such as 1,1,1-trichloroethane, methanol and isopropanol.

6. **Describe the containment of the waste unit as it relates to contaminant migration via groundwater, surface water, and air.**

The FSC was builded with a cement floor and protected with an aluminum ceiling. Lateral walls are also made of cement, however, its front and back sides are made of cyclone fence. In the front side, this fence is appropriate in order to have constant visual contact with the wastes in case any incident, however, in the backside the fence could allow wastes to leave the cage and affect the soil, because the cage was built with a gentle slope towards that side and no dike exist to avoid run off.

The area is always lock and only authorized personnel is allowed to go inside. The FSC is also equipped with other Safety Devices in case of a fire or spill, such as hoses, alarms, emergency telephone and fire extinguisher.

Ref. No. 35

PART III: HAZARD ASSESSMENT

GROUNDWATER ROUTE

1. Describe the likelihood of a release of contaminant(s) to the groundwater as follows: observed, alleged, potential, or none. Identify the contaminant(s) detected or suspected, and provide a rationale for attributing the contaminant(s) to the facility.

No evidence for groundwater contamination resulting from industrial activities within the OCI plant were detected during the onsite visit or through the search of the company files.

Ref. Nos. 7-9,35

2. Describe the aquifer of concern; include information such as depth, thickness, geologic composition, permeability, overlying strata, confining layers, interconnections, discontinuities, depth to water table, groundwater flow direction.

Information on the hydrogeology of the Cayey Region is limited, however, it is known that groundwater occurred under water table conditions within local Terrace deposits of Quaternary Age. This permeable deposits consist of unconsolidated sand, gravel and silt including large cobbles and boulders of volcanic rocks, restricted generally above the level of present stream action. The Quaternary deposits are on top of volcanic deposits of cretaceous age, consisting breccia and lava flows. Outcrops from this deposits can be seen on the hill behind the OCI plant. Base on the logs from local wells, groundwater level range from 120' to 140' deep. Local groundwater flow is in a north-east direction towards the Guavate and La Plata rivers.

Ref. Nos. 7-9

3. Is a designated sole source aquifer within 3 miles on the site?

The water table aquifer within the quaternary terrace deposits is a sole source of groundwater for the Cayey area, even though groundwater supplies are combined with surface water to served the municipality.

Ref. Nos. 3-5,7,35

4. What is the depth from the lowest point of waste disposal/storage to the highest seasonal level of the saturated zone of the aquifer of concern?

There no evidence that suggest the presence of wastes beneath ground surface where the flammable storage cage is located, however, local groundwater can be found more than 100' feet deep.

Ref. Nos. 3-5,7,35

5. What is the permeability value of the least permeable intervening stratum between the ground surface and the aquifer of concern?

The alluvial deposits that holds the local shallow aquifer are highly permeable units, consisting on sands, pebbles and boulders.

Ref. Nos. 9,35

6. What is the net precipitation for the area?

The precipitation for the Cayey municipality was measure to be 70.37" in 1987. The evaporation for the Puerto Rico central area is approximately 62.7".

Ref. No. 12

7. Identify uses of groundwater within 3 miles of the site (i.e., private drinking source, municipal source, commercial, industrial, irrigation, unusable).

Groundwater from the local water table aquifer is use in the Cayey municipality as a private drinking source as well as for public, commercial and industrial purposes.

Ref. Nos. 3-5,7

8. What is the distance to and depth of the nearest well that is currently used for drinking or irrigation purposes?

Distance $\frac{1}{2}$ mile, south-east Depth 167'

The nearest well is La Central well which is operate by PRASA as part of the Cayey urban system to serve water for drinking, commercial and industrial purposes.

Ref. Nos. 3-5,7

9. Identify the population served by the aquifer of concern within a 3 mile radius of the site.

The exact population served from the aquifer of concern within a three mile radius of the site can't be determine because water from underground sources is combine with water from surficial sources to served the Cayey downtown area. The combine urban public system serve a total population of approximately 32,220 people.

Ref. No. 4

SURFACE WATER ROUTE

10. Describe the likelihood of a release of contaminant(s) to surface water as follows: observed, alleged, potential, or none. Identify the contaminant(s) detected or suspected, and provide a rationale for attributing the contaminants to the facility.

Actually, OCI has no discharged into surface water bodies in the Cayey municipality, however, back in 1975 the effluent from the Secondary Sewage Treatment Plant discharged to a tile-drain field, prior to discharged into a storm sewer which emptied into a local unnamed creek. Only one analysis report from the original discharge was submitted by OCI to characterized the waste. From the analysis, there's no evidence to suggest that the discharge was of a toxic nature. The discharge to the creek was authorized by a NPDES permit in 1977. Also in 1977, during an EQB inspection, illegal continuous discharges of wastes to the creek were observed; surface water discharges ended in 1982 when OCI was connected to PRASA.

Ref. Nos. 6,35

11. Identify and locate the nearest downslope surface water. If possible, include a description of possible surface drainage patterns from the site.

The nearest surface water body to the site is an unnamed creek located east of the facility. Although this creek is downslope from the site, the potential surface drainage pattern is obstruct by several man-made structures along the way.

Ref. Nos. 1,35

12. What is the facility slope in percent? (Facility slope is measured from the highest point of deposited hazardous waste to the most downhill point of the waste area or to where contamination is detected).

Measure from the location of the hazardous wastes storage areas, the facility slope is less than 1%.

Ref. Nos. 1,35

13. What is the slope of the intervening terrain in percent? (Intervening terrain slope is measured from the most downhill point of the waste area to the probable point of entry to surface water).

Even though there are several structures between the site and the unnamed creek, the intervening terrain slope in percent is estimated to be less than 3%.

Ref. Nos. 1,35

14. What is the 1-year 24-hour rainfall?

The 1-year 24-hour rainfall for the Cayey municipality was in 1987 approximately 4.87".

Ref. No. 11

15. What is the distance to the nearest downslope surface water? Measure the distance along a course that runoff can be expected to follow.

There's an unnamed creek that flows towards the La Plata river at 2,100 feet east from the Olay site; this distance is a linear measure since the distance along the potential course of run-off can't be measure due to the presence of man-made structures along the way.

Ref. Nos. 1,35

16. Identify uses of surface water within 3 miles downstream of the site (i.e., drinking, irrigation, recreation, commercial, industrial, not used).

There's a surface water intake, 3,000' north east from the site, where the unnamed creek discharges into La Plata river. There are other surface water intakes within 3 miles from the site, although no downstream. Water obtained from this sources is mixed with groundwater to serve the Cayey municipality of drinking water and for commercial and industrial purposes.

Ref. Nos. 3-4

17. Describe any wetlands, greater than 5 acres in area, within 2 miles downstream of the site. Include whether it is a freshwater or coastal wetland.

There are no wetlands, nor freshwater or coastal, within two miles downstream of the site.

Ref. Nos. 1,10,35

18. Describe any critical habitats of federally listed endangered species within 2 miles of the site along the migration path.

The nearest critical habitat of federally listed endangered species is the Cerro del Gato area, which is more than three miles south-west of the site and not along the potential migrational pathway. In this area, is found the Golden Coquí (Eleutherodactylus jasper), which is the rarest of the Puertorican frogs and in process of being protected by the Federal Endangered Species Act.

Ref. Nos. 1,10,35

19. What is the distance to the nearest sensitive environment along or contiguous to the migration path (if any exist within 2 miles)?

There are no sensitive environment along or contiguous to the migration pathway of the site. The nearest sensitive environment to the Olay site is Cerro del Gato and its associated areas, which are located at 3.8 miles in a south-west direction.

Ref. Nos. 1,10,35

20. Identify the population served or acres of food crops irrigated by surface water intakes within 3 miles downstream of the site and the distance to the intake(s).

There's no information available in relation to the acres of food crops irrigated by surface water intakes, although information on estimated water uses from 1982, indicated that water was not used for irrigation purposes in that year. About the population served by intakes within three miles from the site, this information can't be determined because water from surficial deposits is mixed with groundwater to served a combined population of 32,220 people.

Ref. No. 4

21. What is the state water quality classification of the water body of concern?

The state classification for the water body segment of concern is non-support for drinking purposes, due to the presence of pathogens, unknown toxicity, metals, inorganic and others. Local sources of contamination have been identified, including landfills, industries, wastewaters and animal management areas.

Ref. No. 6

22. Describe any apparent biota contamination that is attributable to the site.

Any biota contamination was observed onsite during the site visit or has been alleged to be related to industrial activities within the Olay plant.

Ref. No. 6

AIR ROUTE

23. Describe the likelihood of a release of contaminant(s) to the air as follows: observed, alleged, potential, none. Identify the contaminant(s) detected or suspected, and provide a rationale for attributing the contaminant(s) to the facility.

Potential for air contamination is low at the Olay facilities, base on the nature of the generated wastes and the storage/disposal methods used by the company.

Ref. No. 35

24. What is the population within a 4-mile radius of the site?

The population within a 4-mile radius of the site is 44,186, this amount include residents from the Cidra and Cayey municipalities.

Ref. Nos. 1,12

FIRE AND EXPLOSION

25. Describe the potential for a fire or explosion to occur with respect to the hazardous substance(s) known or suspected to be present on site. Identify the hazardous substance(s) and the method of storage or containment associated with each.

The Flammable Storage Cage is well secure in order to avoid conditions that can cause fires or explosions. The nature of the wastes also minimize this potential, however, is the situation occurs the area is provided with appropriate fire contingency equipment.

Ref. No. 35

26. What is the population within a 2-mile radius of the hazardous substance(s) at the facility?

The population within two miles from the site is approximately 26,015, the amount include mostly, residents from the Cayey downtown area.

Ref. Nos. 1,2

DIRECT CONTACT/ON-SITE EXPOSURE

27. Describe the potential for direct contact with hazardous substance(s) stored in any of the waste units on site or deposited in on-site soils. Identify the hazardous substance(s) and the accessibility of the waste unit.

All hazardous wastes within the Olay Company are stored on the Flammable Storage Cage. This Unit is fence and lock all the time and only authorized personnel is able to enter. The Storage Satellite Area is located within the laboratory and it is also a highly restricted area, so potential for direct contact is low.

Ref. No. 35

28. How many residents live on a property whose boundaries encompass any part of an area contaminated by the site?

Next to the north side fence of the facility, there's a housing complex, from which various houses backyards are facing various tank units and the flammable storage cage. There are approximately 20 to 30 residents living next to the Olay site.

Ref. Nos. 1,2,35

29. What is the population within a 1-mile radius of the site?

The population within a 1-mile radius of the site is 4,952 people.

Ref. Nos. 1,2

INDEX OF REFERENCES

- 1 Topographic map of the Comerío Quadrangle showing the location of the Olay Company, Inc. site in Cayey, PR
- 2 1980 Census of Population and Housing for Puerto Rico - USDC
- 3 Estimated Water Use in Puerto Rico, 1980-82. USGS, Open-File Data Report 85-557, 1986
- 4 Federal Reporting Data System
Public Water System - Comprehensive Report
- 5 Water Supply Systems Maps of the Comerío Quadrangle #44 and the Cayey Quadrangle #45- January, 1983
- 6 Goals and Progress of Stadewide Water Quality Management Planning for PR 1988-1989 EQB May, 1990
- 7 Well System Inventory Catalog PRASA, 1986
- 8 Concentration of the Most Common Volatile Synthetic Organics Chemicals at Public Water-Supply Wells Throughout PR Nov. 84 - May 85, PRASA
- 9 Geology of the Comerío Quadrangle, Puerto Rico, USGS
- 10 Critical Wildlife Areas of Puerto Rico Department of Natural Resources Area of Planning and Resources Analysis September, 1979
- 11 Hourly Precipitation Data for Puerto Rico and Virgin Islands - NOAA, 1987
- 12 Climatological Data Annual Summary for Puerto Rico and Virgin Islands - NOAA, 1987
- 13 Uncontrolled Hazardous Waste Site Ranking System, A User's Manual EPA, 1984

- 14 Pre Score User's Manual EPA, May, 1988
- 15 Letter from Olay Company Inc. (12/6/90) to Ms. Johanna Padró, EQB, to submit the information requested during the PA Off-Site visit. The information consist of an historical background of the company, the WWTP, the Flammable Storage Cage, and significant incidents or spill.
- 16 Letter from Olay Company Inc. (10/8/90) to PRASA to reporting the spill of 15 gallons of laboratory wastes such as pyridine, toluene, chloroform and organic solvents. The accident occurred when a drum full of wastes was left unidentified and misplace, reason why a worker dispose of the wastes (10/2/90) as grease, on the equalization tank of the Dissolved Air Flotation Unit (DAF). Remedial actions were taken the next day when the incident was discovered by the company management. Some of the actions included the recovery of the remaining waste at the PAF, a sampling, and the discontinue of the PRASA discharge.
- 17 Letter (8/4/89) from EQB to the Olay Company, approving the operation of onsite emission sources, through an Air Permit. The letter include the restrictions to the permit, and indicated that the permit would expire on August 4, 1989.
- 18 Olay Company Inc., SARA Tier Two Inventory Report
- 19 Vicks Inc., Spill Prevention Control and Countermeasure Plan
- 20 EQB Memorandum (10/3/89), describing the findings of a Small Quantity Generator Inspection to the Olay Co., on October 3, 1989. The inspector found that the company was generating 15 gallons of waste solvents, quarterly, and 15 gallons of ink annually. A list of the company waste manifest was also enclosed. The day of the inspection, only one 15 gallon drum, half empty, was found containing organic solvents in the laboratory area. The area designed as the hazardous waste storage area was equipped with counter spill measures, and fire prevention devices. No wastes were present in the storage area at that moment. In general the site was found in compliance with all requirements for the SQG facilities.

- 21 EQB Memorandum (3/6/86) describing the findings of a full RCRA Generator Inspection to the Olay Co. in Cayey performed on January 27, 1986. During the inspection the Engineering Manager of the plant was interview and informed that the building was originally operated by the Merrell - National Laboratories, Inc. formerly called Vicks-Merrell, Inc. Vicks then sold the property to Olay Co., a subsidiary of Richardson Vicks, Inc., which cause the EPA ID Number to change from PR0090450255 to PRD090450255.

Even though the company do not generated hazardous wastes, it was listed as a full generator because one of their products, trade-name Sinex, contains thimerosal, a mercury salicylate used as antiseptic and germicide. Waste waters containing the substance was treated with charcoal cartridges, then the water was transferred to the facility waste water treatment plant, and later discharge to the sewage system.

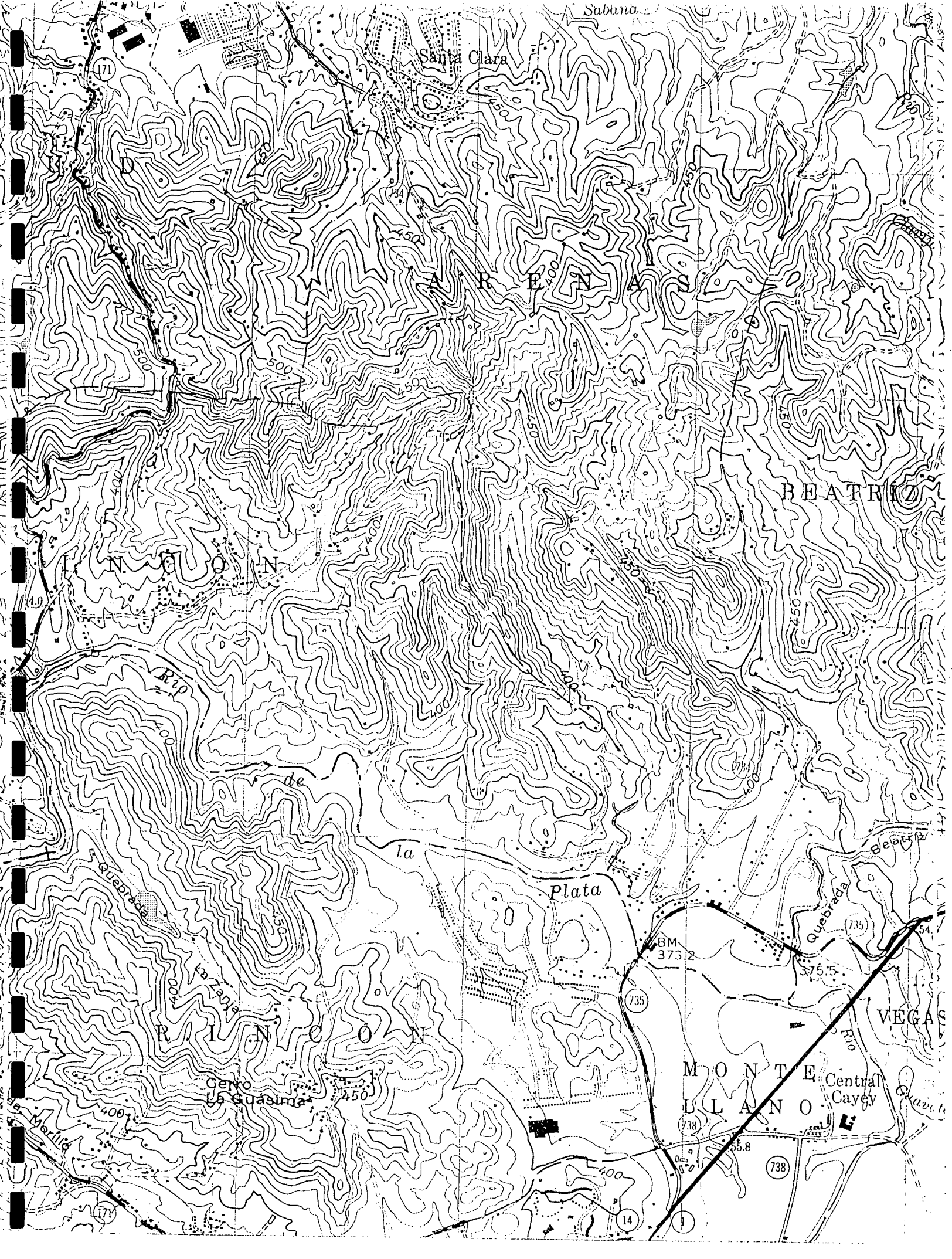
A reclassification of Full Generator to Small Quantity Generator was granted by EQB to Vicks Inc. in 1984. The inspection found that the company do not operated any storage area, because no wastes were generated at that time.

- 22 Olay Company Inc., SARA Toxic Chemical Release Inventory Reporting Form - EPA R Form
- 23 EQB Letter (12/11/84) to Vicks, Inc. approving their request for a declassification from Generator a Small Quantity Generator.
- 24 EQB Inspection Report (10/11/84) from a Full RCRA Generator Inspection performed to Vicks Inc. on September 24, 1984. From the inspection, EQB technicians reported the production of Sinex waste waters containing mercury salicylate. This waters where treated with a charcoal filters to remove solids from the water prior to discharge the waters to the company WWTP. Only ten 55-gallons drums containing waste waters were stored in the facility and only five 55-gallons drums containing carbon filters were dispose through the Servicios Carbareón Company.

- 25 Letter from Vicks Inc. (6/13/84) to EPA to informed a change in the owner operator of the facility from Merrell-National. Labs to Olay Co. of Richardson-Vicks Inc. Vicks also request EPA to eliminated the previous Merrell ID Number, since the new Olay Co. was not a generator of hazardous wastes.
- 26 Letter from Vicks Inc. (8/29/83) to EQB submitting their "Application for Declassification of Facilities".
- 27 Letter from Vicks Inc. (12/7/82) to EPA, Region II, requesting a reclassification to a small quantity generator status, based on the type and amount of waste they generated at that time.
- 28 Letter from Vicks Inc. (6/1/82) to PRASA requesting comments on their proposal to increase the amount of their waste waters discharge to the PRASA WWTP, by add the effluents of pre-treated waste waters, from their Sinex production. Waters resulting from the Sinex production were contaminated with mercury silicate from an antiseptic compound called Timesoral. Vicks Inc. proposed to pre-treat the contaminated waters with charcoal filters to remove solids including the mercury and then discharge it in their own WWTP before the final discharge to the public sewage system.
- 29 Letter from Servicios Carbareón (10/2/79) to EQB, to explained their proposal of disposed of the Vicks-Merrell Sinex waste waters at their lagoons in Peñuelas. The idea was to evaporated the water to decrease the waste volume and than disposed of the solid wastes through a land treatment process.
- 30 EQB, Industrial Hazardous and Toxic Waste Study for Vicks-Merrell Co, Cayey, PR. Among the findings of the study, was a list of compounds used in the production of medicines such as, calcium carbonate, carbonylpyrrolmethylen, zinc, mercury, dibasic phosphate and others. In relation to the wastes containing mercury it was found that Vicks disposed of them at Greenpovox in North Carolina. Non-hazardous wastes were disposed on the local landfill, as well as the filters from their WWTP.

- 31 EPA Notification of Hazardous Waste Activity for Vicks Inc., Cayey, PR
- 32 Letter from Vicks (6/1/82) to EPA Region II, describing the process of generate, treat and dispose of the Sinex waste waters contaminated with mercury.
- 33 Findings of Violation and Order for Compliance in the matter of Vicks Inc./Merrell-National Laboratories, Inc., September 29, 1981. The order stipulated that Vicks-Merrell NPDES discharges was in violation of the parameters of the permit; EQB requested from Vicks to fulfill with the requirements of the permit through a schedule of compliance.
- 34 Letter from EQB (11/4/77) to Vicks, Inc. to inform the findings of a Water Quality Control Areas Inspection, in which violations were found. During the inspection continuous discharges of waste waters to a local creek were observed even though EQB authorized the company to discharge only during heavy rain circumstances. EQB announced in the letter, their intention to report EPA of the violation, because of the company lack of NPDES Permit.
- 35 Off Site Reconnaissance Report

REFERENCE 1



REFERENCE 2

Superfund
NOT TO BE SOLD

PRELIMINARY REPORTS

1980 Census of Population and Housing

PHC80-P-53

PUERTO RICO

Preliminary Population and Housing Unit Counts

This report is based on preliminary counts of population and housing units as compiled in the 1980 census district offices. The series consists of 56 reports—number 1 for the United States; numbers 2 through 52 for the States and the District of Columbia in alphabetical order rather than in order of publication; and numbers 53 through 56 for Puerto Rico, Guam, Virgin Islands, and American Samoa. Preliminary counts for the Northern Mariana Islands and the remainder of the Trust Territory of the Pacific Islands are not part of this series of reports. These counts will be made available in a separate press release issued for each area.

As of April 1, 1980, the population of Puerto Rico was 3,187,570, according to a preliminary count of the returns of the 1980 census. This figure represents an increase of 475,537, or 17.5 percent, from the 2,712,033 inhabitants enumerated in the 1970 census.

The preliminary count of housing units in Puerto Rico as of April 1, 1980, was 990,172. This figure, which includes both occupied and vacant housing units, represents an increase of 276,459, or 38.7 percent, from the 713,713 units enumerated in the 1970 census.

This report presents preliminary 1980 census population and housing unit counts for the Commonwealth,

municipios, municipio subdivisions, zonas urbanas, and standard metropolitan statistical areas (SMSA's).

The 1970 data are presented only for Puerto Rico and its municipios. The boundaries used in the 1970 census did not represent the official boundaries of some of the barrios, ciudades, and pueblos.

These preliminary figures will be superseded by the final counts to be shown in Advance Reports, series PHC80-V, which will be issued within the next few months. The final counts are subject to further processing and review and may differ from the preliminary figures.

An outline of the publication and computer tape program for the 1980 Census of Population and Housing can be obtained free of charge from the Data User Services Division, Bureau of the Census, Washington, D.C. 20233.

Symbols used in tables. A dash "--" represents zero. Three dots "..." means not applicable, and "(NA)" means not available. The prefix "r" indicates that the count has been revised since publication of 1970 census reports.

Issued February 1981

Population and Housing Unit Counts for Puerto Rico by Municipios and Municipio Subdivisions: 1980 and 1970 - Con.

(Counts relate to areas as delineated at each census. Information on boundary changes will be shown in the PC80-1-A report for this area. For meaning of symbols, see text)

Puerto Rico Municipios Municipio Subdivisions

	Population		Housing units	
	1980 (preliminary)	1970	1980 (preliminary)	1970
Bayamon Municipio	195 965	156 192	56 114	39 566
Bayamon pueblo	6 710		2 462	
Bayamon zona urbana (pt.)	6 710		2 462	
Buena Vista barrio	10 245		2 910	
Bayamon zona urbana (pt.)	8 507		2 392	
Cerro Gordo barrio	31 426		9 197	
Bayamon zona urbana (pt.)	31 426		9 197	
Dojales barrio	1 596		462	
Guaragua Abajo barrio	2 630		796	
Bayamon zona urbana (pt.)	756		236	
Guaragua Arriba barrio	512		144	
Hato Tejas barrio	43 945		12 315	
Bayamon zona urbana (pt.)	43 945		12 315	
Juan Sanchez barrio	15 330		4 176	
Bayamon zona urbana (pt.)	15 330		4 176	
Minillas barrio	42 574		12 377	
Bayamon zona urbana (pt.)	42 574		12 377	
Nuevo barrio	2 234		708	
Pajaros barrio	35 606		9 680	
Bayamon zona urbana (pt.)	35 606		9 680	
Santa Olaya barrio	3 157		887	
Cabo Rojo Municipio	33 909	26 060	12 608	8 272
Bajura barrio	2 457		825	
Cabo Rojo zona urbana (pt.)	1 582		520	
Boqueron barrio	3 612		1 502	
Cabo Rojo pueblo	1 913		795	
Cabo Rojo zona urbana (pt.)	1 913		795	
Guanajibo barrio	2 317		1 115	
Llanos Costa barrio	1 836		668	
Llanos Tuna barrio	4 864		1 716	
Miradero barrio	8 805		3 041	
Cabo Rojo zona urbana (pt.)	3 762		1 146	
Monte Grande barrio	4 888		1 816	
Cabo Rojo zona urbana (pt.)	2 283		832	
Pedernales barrio	3 217		1 130	
Cabo Rojo zona urbana (pt.)	714		212	
Caguas Municipio	118 020	95 661	35 266	24 904
Bairoa barrio	14 575		4 419	
Caguas zona urbana (pt.)	10 928		3 412	
Beatriz barrio	3 568		1 067	
Borinquen barrio	4 000		1 052	
Caguas pueblo	28 745		9 331	
Caguas zona urbana (pt.)	28 745		9 331	
Canabon barrio	2 787		790	
Caguas zona urbana (pt.)	9 940		544	
Canabonito barrio	24 144		6 990	
Caguas zona urbana (pt.)	20 431		5 964	
Rio Canas barrio	6 786		1 817	
San Antonio barrio	1 648		512	
San Salvador barrio	2 341		633	
Tomas de Castro barrio	13 808		4 164	
Caguas zona urbana (pt.)	10 277		3 117	
Turabo barrio	16 118		4 491	
Caguas zona urbana (pt.)	14 897		4 126	
Camuy Municipio	24 886	19 922	7 546	5 289
Abra Honda barrio	1 862		515	
Camuy pueblo	1 488		543	
Camuy zona urbana (pt.)	1 488		543	
Camuy Arriba barrio	2 053		555	
Cibao barrio	1 078		320	
Cienegras barrio	1 050		321	
Membrillo barrio	1 542		472	
Piedra Gorda barrio	1 707		466	
Puente barrio	5 542		1 885	
Camuy zona urbana (pt.)	2 344		729	
Puertas barrio	1 309		378	
Quebrada barrio	2 926		811	
Santiago barrio	310		75	
Yeguada barrio	1 570		501	
Zanja barrio	2 449		704	
Canovanas Municipio	31 934		9 346	
Canovanas barrio	12 809		3 619	
Canovanas zona urbana (pt.)	4 195		1 193	
Canovanas pueblo	3 068		985	
Canovanas zona urbana (pt.)	3 068		985	
Cubuy barrio	1 318		508	
Hato Puerto barrio	4 866		1 437	
Lomas barrio	4 651		1 361	
Torrecillo Alto barrio	5 222		1 436	
Carolina Municipio	165 207	107 643	52 753	29 525
Barreras barrio	2 877		843	
Cacao barrio	2 687		793	
Congreso Arriba barrio	16 191		9 204	
Carolina zona urbana (pt.)	16 191		9 204	
Canovanillas barrio	5 086		1 471	
Carolina zona urbana (pt.)	3 513		1 019	
Carolina pueblo	1 642		563	
Carolina zona urbana (pt.)	1 642		563	
Cerritos barrio	1 736		495	
Cedro barrio	1 303		407	
Hoyo Mulas barrio	36 392		9 915	

Puerto Rico Municipios Municipio Subdivisions

	Population		Housing units	
	1980 (preliminary)	1970	1980 (preliminary)	1970
Carolina Municipio	165 207	107 643	52 753	29 525
Hoyo Mulas barrio - Con				
Carolina zona urbana (pt.)	30 713		8 291	
Martin Gonzalez barrio	19 412		5 592	
Carolina zona urbana (pt.)	19 412		5 592	
Sabana Abajo barrio	62 578		18 906	
Carolina zona urbana (pt.)	62 578		18 906	
San Anton barrio	7 326		2 300	
Carolina zona urbana (pt.)	7 326		2 300	
Santa Cruz barrio	1 596		463	
Trujillo Bejo barrio	6 381		1 801	
Carolina zona urbana (pt.)	5 725		1 613	
Catano Municipio	26 318	26 459	7 632	6 738
Catano pueblo	4 594		1 785	
Catano zona urbana (pt.)	4 594		1 785	
Palmas barrio	21 724		5 847	
Catano zona urbana (pt.)	21 724		5 847	
Cayey Municipio	40 927	38 432	12 308	9 393
Beatriz barrio	1 212		333	
Cayey pueblo	19 815		6 016	
Cayey zona urbana (pt.)	19 815		6 016	
Cedro barrio	306		101	
Cercadillo barrio	232		64	
Culebras Alto barrio	165		66	
Culebras Bajo barrio	277		74	
Farallon barrio	379		110	
Guavate barrio	942		277	
Jajome Alto barrio	548		163	
Jajome Bajo barrio	583		182	
Lapa barrio	153		48	
Maton Abajo barrio	938		312	
Maton Arriba barrio	625		178	
Monte Llano barrio	2 612		711	
Cayey zona urbana (pt.)	1 147		268	
Pasto Viejo barrio	524		178	
Pedro Avila barrio	258		77	
Piedras barrio	23		11	
Quebrada Arriba barrio	972		328	
Rincon barrio	2 340		722	
Cayey zona urbana (pt.)	101		32	
Sumido barrio	426		133	
Taita barrio	5 854		1 756	
Cayey zona urbana (pt.)	2 252		684	
Vegas barrio	1 743		468	
Ceiba Municipio	14 781	10 312	4 592	2 977
Ceiba pueblo	3 008		1 042	
Ceiba zona urbana (pt.)	3 008		1 042	
Chupacallos barrio	2 709		827	
Daguan barrio	111		38	
Guayacan barrio	3 134		974	
Machos barrio	2 341		778	
Ceiba zona urbana (pt.)	1 956		637	
Quebrada Seca barrio	1 656		297	
Rio Abajo barrio	786		276	
Saca barrio	1 036		360	
Ciales Municipio	16 014	15 595	4 582	3 640
Ciales pueblo	1 426		516	
Ciales zona urbana (pt.)	1 426		516	
Cualitas barrio	1 417		333	
Cordillera barrio	1 901		519	
Ciales zona urbana (pt.)	300		93	
Fronton barrio	1 876		543	
Hato Viejo barrio	1 504		498	
Jaguas barrio	4 000		1 063	
Ciales zona urbana (pt.)	1 864		467	
Pesos barrio	1 694		485	
Puzas barrio	1 318		355	
Toro Negro barrio	878		270	
Cidra Municipio	28 135	23 892	7 832	5 089
Arenas barrio	4 171		1 167	
Cidra zona urbana (pt.)	1 942		503	
Bayamon barrio	6 486		1 679	
Cidra zona urbana (pt.)	420		118	
Beatriz barrio	2 076		647	
Ceiba barrio	2 870		835	
Cidra zona urbana (pt.)	1 749		229	
Cidra pueblo	1 661		568	
Cidra zona urbana (pt.)	1 661		568	
Handuras barrio	1 135		294	
Monte Llano barrio	614		194	
Rabanal barrio	2 270		625	
Rincon barrio	2 216		623	
Rio Abajo barrio	772		218	
Salto barrio	187		47	
Sud barrio	3 092		776	
Cidra zona urbana (pt.)	1 293		276	
Taita barrio	585		159	
Coamo Municipio	30 752	26 468	8 816	6 327
Coamo pueblo	10 229		3 220	
Coamo zona urbana (pt.)	10 229		3 220	
Coamo Arriba barrio	461		159	

Population and Housing Unit Counts for Puerto Rico by Municipios and Municipio Subdivisions: 1980 and 1970—Con.

[Counts relate to areas as delineated at each census. Information on boundary changes will be shown in the PC80-1-A report for this area. For meaning of symbols, see text.]

Puerto Rico Municipios Municipio Subdivisions

	Population		Housing units	
	1980 (preliminary)	1970	1980 (preliminary)	1970
Coamo Municipio—Con.				
Cuyan barrio	938		240	
Mayales barrio	1 217		348	
Los Llanos barrio	2 465		718	
Palmarejo barrio	4 002		1 062	
Coamo zona urbana (pt.)	2 108		569	
Pasto barrio	2 643		654	
Coamo zona urbana (pt.)	40		15	
Pedro García barrio	677		178	
Pulguitas barrio	1 580		425	
San Ildefonso barrio	5 009		1 373	
Coamo zona urbana (pt.)	457		117	
Santa Catalina barrio	1 531		439	
Comerio Municipio	18 212	18 819	5 223	4 401
Cedrito barrio	1 065		306	
Cejas barrio	499		153	
Comerio pueblo	5 312		1 604	
Comerio zona urbana (pt.)	5 312		1 604	
Dona Elena barrio	2 650		736	
Naranja barrio	1 854		573	
Palomas barrio	3 234		899	
Comerio zona urbana (pt.)	114		28	
Pinos barrio	1 728		408	
Comerio zona urbana (pt.)	325		68	
Rio Hondo barrio	1 316		410	
Vega Redonda barrio	554		134	
Corozal Municipio	28 218	24 545	7 947	5 628
Abras barrio	1 197		367	
Cibuca barrio	3 459		949	
Corozal pueblo	1 660		616	
Corozal zona urbana (pt.)	1 660		616	
Cuchillas barrio	1 164		309	
Dos Bocas barrio	2 186		596	
Corozal zona urbana (pt.)	291		68	
Maguayes barrio	1 265		78	
Maná barrio	1 258		317	
Negros barrio	855		251	
Padilla barrio	2 683		704	
Palmarejo barrio	3 993		1 150	
Palmarito barrio	1 948		521	
Palos Blancos barrio	2 343		695	
Pueblo barrio	5 207		1 394	
Corozal zona urbana (pt.)	3 940		1 058	
Culebra Municipio	1 265	732	519	248
Culebra pueblo	848		288	
Culebra zona urbana (pt.)	848		288	
Flamenco barrio	265		116	
Culebra zona urbana (pt.)	40		9	
Fraila barrio	9		22	
Playa Sardinias I barrio	44		9	
Culebra zona urbana (pt.)	31		78	
Playa Sardinias II barrio	91		4	
Culebra zona urbana (pt.)	18		6	
San Isidro barrio	8			
Dorado Municipio	25 515	17 388	8 212	4 415
Dorado pueblo	1 345		447	
Dorado zona urbana (pt.)	1 345		447	
Espinosa barrio	2 857		783	
Higuillar barrio	16 089		5 504	
Dorado zona urbana (pt.)	8 859		3 162	
Maguayo barrio	2 959		836	
Mameyal barrio	55		14	
Rio Lajas barrio	2 210		628	
Fajardo Municipio	32 011	23 032	12 366	7 222
Cabezas barrio	1 229		931	
Demajagua barrio	113		43	
Fajardo pueblo	16 328		5 983	
Fajardo zona urbana (pt.)	16 328		5 983	
Florencio barrio	1 661		565	
Fajardo zona urbana (pt.)	1 135		57	
Nafanjo barrio	8 114		2 678	
Quebrada Fajardo barrio	8 114		2 678	
Fajardo zona urbana (pt.)	2 422		847	
Rio Arriba barrio	1 267		412	
Sardinera barrio	742		850	
Fajardo zona urbana (pt.)	742		850	
Florida Municipio	7 193		2 279	
Florida Adentro barrio	7 193		2 279	
Florida zona urbana	3 610		1 123	
Guanica Municipio	18 784	14 889	6 302	4 462
Arena barrio	100		35	
Cano barrio	969		310	
Carenero barrio	1 882		655	
Guanica zona urbana (pt.)	213		86	
Cienega barrio	1 995		682	
Guanica zona urbana (pt.)	18		6	
Ensenada barrio	1 976		761	
Guanica zona urbana (pt.)	1 970		759	
Guanica pueblo	5 312	(NA)	1 702	(NA)

Puerto Rico Municipios Municipio Subdivisions

	Population		Housing units	
	1980 (preliminary)	1970	1980 (preliminary)	1970
Guanica Municipio—Con.				
Guanica pueblo—Con.				
Guanica zona urbana (pt.)	5 312		1 702	
Montalva barrio	2 851		1 063	
Guanica zona urbana (pt.)	2 114		718	
Susua Baja barrio	3 699		1 094	
Guayama Municipio	40 137	36 249	12 339	9 046
Algarrobo barrio	5 207		1 595	
Guayama zona urbana (pt.)	2 317		702	
Caimital barrio	3 665		996	
Guayama zona urbana (pt.)	275		93	
Carite barrio	1 158		395	
Carmen barrio	663		194	
Guamani barrio	1 546		491	
Guayama pueblo	18 452		5 930	
Guayama zona urbana (pt.)	18 452		5 930	
Jobas barrio	6 963		2 018	
Machete barrio	757		219	
Palmas barrio	1 033		338	
Pazo-Hondo barrio	693		163	
Guayanilla Municipio	21 012	18 144	6 080	4 596
Barrera barrio	823		236	
Boca barrio	1 327		369	
Cedro barrio	4		3	
Consejo barrio	799		225	
Guayanilla pueblo	5 635		1 583	
Guayanilla zona urbana (pt.)	5 635		1 583	
Indios barrio	1 894		525	
Jagua Pasta barrio	287		76	
Jaguas barrio	600		178	
Llano barrio	524		163	
Macaná barrio	1 342		383	
Magas barrio	2 351		700	
Guayanilla zona urbana (pt.)	556		187	
Pasto barrio	387		111	
Playa barrio	1 466		466	
Quebrada Honda barrio	387		132	
Quebrados barrio	2 326		650	
Rufina barrio	237		66	
Sierra Baja barrio	629		214	
Guaynabo Municipio	80 857	67 042	24 381	16 870
Camarones barrio	4 689		1 482	
Guaynabo zona urbana (pt.)	3 700		1 155	
Frailas barrio	15 614		4 294	
Guaynabo zona urbana (pt.)	15 614		4 294	
Guaraguao barrio	3 426		974	
Guaynabo pueblo	2 434		783	
Guaynabo zona urbana (pt.)	2 434		783	
Hato Nuevo barrio	2 214		703	
Mamey barrio	2 104		531	
Pueblo Viejo barrio	38 967		12 295	
Guaynabo zona urbana (pt.)	38 967		12 295	
Rio barrio	2 573		699	
Santa Rosa barrio	8 108		2 375	
Guaynabo zona urbana (pt.)	4 376		1 255	
Sanadara barrio	728		245	
Gurabo Municipio	23 576	18 289	6 937	4 606
Celada barrio	1 780		537	
Gurabo pueblo	1 985		791	
Gurabo zona urbana (pt.)	1 985		791	
Hato Nuevo barrio	3 388		932	
Jaguer barrio	713		232	
Jaguas barrio	1 562		488	
Mamey barrio	1 870		598	
Gurabo zona urbana (pt.)	323		97	
Masa barrio	1 147		354	
Navarro barrio	2 977		804	
Quebrada Inferno barrio	694		249	
Rincon barrio	7 460		1 952	
Gurabo zona urbana (pt.)	5 338		1 358	
Hatillo Municipio	28 973	21 913	8 484	5 898
Aibonito barrio	2 546		798	
Bayaney barrio	2 392		690	
Buena Vista barrio	2 034		630	
Campo Alegre barrio	3 757		1 160	
Capoez barrio	2 624		735	
Carrizales barrio	3 796		1 133	
Corcovado barrio	2 825		800	
Hatillo barrio	2 727		779	
Hatillo zona urbana (pt.)	1 985		545	
Hatillo pueblo	3 054		909	
Hatillo zona urbana (pt.)	3 054		909	
Naranjito barrio	2 818		850	
Hormigueros Municipio	13 983	10 827	4 451	3 105
Benavente barrio	118		65	
Guanajibo barrio	6 123		1 803	
Hormigueros zona urbana (pt.)	6 118		1 798	
Hormigueros barrio	2 938		933	
Hormigueros zona urbana (pt.)	2 416		754	
Hormigueros pueblo	1 257		435	

REFERENCE 3

ESTIMATED WATER USE IN PUERTO RICO, 1980-82

By Heriberto Torres-Sierra and Ada Avilés

**U.S. GEOLOGICAL SURVEY
OPEN-FILE DATA REPORT 85-557**



**Prepared in cooperation with the
PUERTO RICO DEPARTMENT OF NATURAL RESOURCES,
PUERTO RICO AQUEDUCT AND SEWER AUTHORITY,
PUERTO RICO ENVIRONMENTAL QUALITY BOARD,
PUERTO RICO DEPARTMENT OF AGRICULTURE, AND
PUERTO RICO ELECTRIC POWER AUTHORITY**

**San Juan, Puerto Rico
1986**

Table 3. Public water supply withdrawals by municipio for 1982, in million gallons per day.

MUNI- CIPIO CODE	MUNICIPIO	SURFACE WATER	GROUND WATER	MUNI- CIPIO CODE	MUNICIPIO	SURFACE WATER	GROUND WATER	MUNI- CIPIO CODE	MUNICIPIO	SURFACE WATER	GROUND WATER
001	ADJUNTAS	1.45		053	FAJARDO	4.56		103	NAGUABO	11.65	
003 *	AGUADA			054	FLORIDA		1.25	105	NARANJITO	1.74	
005 *	AGUADILLA			055	GUANICA		3.31	107	OROCOVIS	2.07	
007	AGUAS BUENAS	1.17		057	GUAYAMA	3.61	.81	109	PATILLAS	.34	.85
009	AIBONITO	1.74	0.40	059	GUAYANILLA	.52	1.02	111	PENUELAS	2.34	
011	ANASCO	.42		061	GUAYNABO	26.12		113	PONCE	20.64	9.92
013	ARECIBO	2.79	8.86	063	GURABO		.39	115	QUEBRADILLAS	19.29	.29
015	ARROYO		.74	065	HATILLO	2.00		117	RINCON		.76
017	BARCELONETA		3.87	067	HORMIGUEROS		1.29	119	RIO GRANDE	3.15	
019	BARRANQUITAS	.83	.09	069	HUMACAO	2.54		121	SABANA GRANDE	1.20	.51
021	BAYAMON	.59		071 *	ISABELA			123	SALINAS		4.13
023	CABO ROJO		2.75	073	JAYUYA	1.04		125	SAN GERMAN	1.37	1.54
025	CAGUAS	7.75	.76	075	JUANA DIAZ	.65	2.92	127	SAN JUAN	.14	
027	CAMUY	.55		077	JUNCOS	3.05		129	SAN LORENZO	2.70	
029	CANOVANAS	5.92		079 *	LAJAS			131	SAN SEBASTIAN	2.59	
031 *	CAROLINA	.02		081	LARES	1.99		133	SANTA ISABEL		3.03
033 *	CATANO			083	LAS MARIAS	.69		135	TOA ALTA	51.36	
035	CAYEY	3.31	.62	085	LAS PIEDRAS	.09		137	TOA BAJA		3.43
037 *	CEIBA			087 *	LOIZA			139	TRUJILLO ALTO	72.71	
039	CIALES	1.10		089	LUQUILLO	2.18		141	UTUADO	1.97	
041	CIDRA	.96	.69	091	MANATI		8.58	143	VEGA ALTA	.19	3.31
043	COAMO	1.60	1.06	093	MARICAO	.68		145	VEGA BAJA	1.62	6.36
045	COMERIO	.87	.17	095	MAUNABO	.07	1.19	147 *	VIEQUES		
047	COROZAL	3.10		097	MAYAGUEZ	14.74		149	VILLALBA	1.60	
049	CULEBRA		+.05	099 *	MOCA			151	YABUCOA	.47	.76
051	DORADO		4.69	101	MOROVIS	2.09		153	YAUCO	1.85	.24
						SURFACE WATER	303.15				
						GROUND WATER	80.64				
						TOTAL	383.79				

* SUPPLIED FROM ANOTHER MUNICIPIO
+ SALINE WATER

NOTE: VALUES REPRESENT WITHDRAWALS OCCURRING WITHIN MUNICIPIO BOUNDARY.

ESTIMATED WATER-USE IN PUERTO RICO
PRINCIPAL WATER-USE CATEGORIES BY COUNTY

TOTAL WITHDRAWALS AND DELIVERIES

IN MILLION GALLONS PER DAY (Mgal/d)

~ 1985 ~

COUNTY NAME	PUBLIC SUPPLY	DOM.	IND.	ELEC.	AGR. NON-IRR.	AGR. IRR.	TOTAL
ADJUNTAS	1.12	0.32	0.00	0.00	0.02	0.00	1.46
AGUADA	0.00	0.28	0.00	0.00	0.02	0.00	0.30
AGUADILLA	0.00	0.32	0.00	0.00	0.06	0.00	0.38
AGUAS BUENAS	1.08	0.22	0.00	0.00	0.08	0.00	1.38
AIBONITO	2.14	0.12	0.00	0.00	0.14	0.00	2.40
AÑASCO	0.35	0.20	0.00	0.00	0.02	0.00	0.57
ARECIBO	12.91	0.44	3.40	0.00	0.72	1.63	19.10
ARROYO	0.66	0.06	0.00	0.00	0.02	1.20	1.94
BARCELONETA	4.34	0.12	3.39	0.00	0.03	0.05	7.93
BARRANQUITAS	1.23	0.22	0.00	0.00	0.08	0.00	1.53
BAYAMON	0.36	0.26	0.07	0.00	0.03	0.00	0.72
CABO ROJO	2.96	0.22	0.00	0.00	0.13	0.00	3.31
CAGUAS	7.01	0.76	0.00	0.00	0.24	0.00	8.01
CAMUY	0.54	0.22	0.00	0.00	0.40	0.00	1.16
CANDOVANAS	5.91	0.54	0.00	0.00	0.09	0.00	6.54
CAROLINA	0.00	0.38	0.00	0.00	0.14	0.00	0.52
CATAÑO	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CAYEY	3.99	0.12	0.00	0.00	0.14	0.00	4.25
CEIBA	0.00	0.18	0.00	0.00	0.05	0.00	0.23
CIALES	1.19	0.18	0.00	0.00	0.05	0.00	1.42

REFERENCE 4

05/31/85
FRDS01

FEDERAL REPORTING DATA SYSTEM
PUBLIC WATER SYSTEM - COMPREHENSIVE REPORT
PUERTO RICO PUBLIC WATER SUPPLIES - SURFACE WATER SOURCES
SORTED BY PWS ID

FY 1902
PAGE 127

EPA REGION: 02 SURVEILLANCE STATE: PR PRIMACY: Y PWS ID: PR0004635

OWNER NAME : CAYEY URBANO PHONE: (809) 754-3232 INDIAN RESERVATION CODE:
OWNER ADDRESS: ROAD 1 59.5 KM PLANT AREA LOCATION: COMPLIANCE CYCLE : 01
CAYEY PR 00633 CITY : CAYEY POSTAL CODE : PR
MAILING NAME : PRASA COUNTY : PLANT TYPE : C
MAILING ADDRESS: PO BOX 7066 BO OBRERO STATION ADMIN REGION : 05 OWNER TYPE : S
SANTURCE PR 00916 ADMIN DISTRICT: FRDS COUNTY CODE :

PLANT SERVICE AREA:
RESIDENTIAL: COMPANY TOWN: RECREATION: MOBILE HOMES: INSTITUTION: SCHOOL: OTHER AREA:
HOTEL: RESTAURANT: SERV STATION: CAMPGROUND: PICNIC AREA: LODGE:
MARINA: SKI RESORT: BATHING: VISITOR CENTER: HWY REST AREA: AIRPORT:

ACTIVE INDICATOR : A INITIAL DATE : 07/06/83 BEGIN DATE : 06/01/77 CONSECUTIVE INDICATOR: 0
POPULATION SERVED : 32,220 NUMBER OF SERVICES: 8,055 NUMBER OF METERS: 8,055 # OF CONSECUTIVE PWS :
DESIGN CAPACITY : OK EMERGENCY POWER : 300K STORAGE CAPACITY: OK MAXIMUM PRODUCTION : 3,700K
INTERSTATE CARRIER : N AVERAGE PRODUCTION: 2,400K LAST SURVEY DATE: LAST UPDATE DATE : 04/15/86
DEACTIVATION REASON: DEACTIVATION DATE: MANUAL FILE : REGULATE BY : B
FACILITY LATITUDE : 01903 FACILITY LONGITUDE: 06608 SMSA CODE : 7440 HYDROLOGICAL ID :

STATE DISCRETIONARY DATA:
BACTERIOLOGICAL FLAG: L MINIMUM NUMBER DAILY CHECKS: NON-COMMUNITY SAMPLING FREQ: SEASON:
MONTHLY MONITORING: SAMPLES PER QUARTER: MCL HALT CHECK SAMPLE: START: 00/00
% CHLORINE SUBSTITU: TURBIDITY FLAG: L TURBIDITY LIMIT: END: 00/00

CHEMICAL: LABORATORY DATA:
ORGANIC BEGIN PERIOD: ORGANIC END PERIOD: # OF TTHM SAMPLES: TYPE: BACT PHYS INORG ORG RAD
AIR TEMPERATURE: NITRATE FREQUENCY: # OF PLANTS: CONTROL: N N N N
TTHM SAMPLE FREQ: Q

RADIOACTIVE:
MONITORING FLAG : 3 BETA FREQUENCY MONTHS: MONITOR GROSS ALPHA: MONITOR RADIUM MONTHS: RADIOACTIVE FLAG: 4
GROUND WATER MONITOR: # OF SAMPLES PER YEAR: NUCLEAR FACILITY: N NUCLEAR FACILITY TYPES:
FACILITY CONTAMINANT ID:
SAMPLING FREQUENCY:

SOURCE AND/OR ENTRY POINT INFORMATION:
(SRC) (EPT)
TREATMENTS
A P C S F C S T I A F D O R R R
E R O E I O O A R M L I T E E E
R E A D L R F S O M A S H S S S
A C G I T R T N O O I R 1 2 3
Y Y Y Y Y Y Y
TYPE NAME CODE LATITUDE LONGITUDE WELLS # OF BASIN SELLER ENTRY POINT TURB TURB FLAG UNITS
SRC LA PLATA RIVER S P
SRC MENTE DE NIERRO S P
SRC POLVORIN WELL S P
SRC CAYEY WENT G P

FEDERAL REPORTING DATA SYSTEM
PUBLIC WATER SYSTEM - COMPREHENSIVE REPORT
PUERTO RICO PUBLIC WATER SUPPLIES - SURFACE WATER SOURCES
SORTED BY PWS ID

EPA REGION: 02 SURVEILLANCE STATE: PR PRIMACY: Y PWS ID: PR0004635

TREATMENTS

(SRC)	(EPT)			# OF	BASIN	SELLER	ENTRY	TURB	TURB	A P C S F C S T I A F D O R R R		
TYPE	NAME	CODE	LATITUDE	LONGITUDE	WELLS	AVAIL	#	ID	POINT	FLAG	UNITS	E R O E I O O A R M L I T E E E
										R E A D L R F S O M A S H S S S		A C G I T R T T N O D I R 123
SRC	HQOTE WELL	G			P							
SRC	CASERIO NO.2	G			P							
SRC	CASERIO NO.1	G			P							
SRC	VALDINIERO WELL	G			P							
SRC	LA CENTRAL WELL	G			P							
SRC	HENRY BARRAQUA2	G			P							
SRC	HENRY BARRAQUA1	G			P							
SRC	PLANACIE NO.2	G			P							
SRC	PUENTE DE HIERR	S	0190613	0660819	P							
SRC	LA PLATA	S	0190723	0660755	P							
SRC	VALDIVIESO	G	0130657	0660926	P							

LOCATE STATEMENT:
LOCATE (0) C100 WH NK C103 EQ S AND NK C194 EQ A AND C2 EQ PR:

FEDERAL REPORTING DATA SYSTEM
PUBLIC WATER SYSTEM - COMPREHENSIVE REPORT
PUERTO RICO PUBLIC WATER SUPPLIES - SURFACE WATER SOURCES
SORTED BY PWS ID

EPA REGION: 02 SURVEILLANCE STATE: PR PRIMACY: Y PWS ID: PR0004655

OWNER NAME :	BO CEDRO	PHONE :	(809) 754-3232	INDIAN RESERVATION CODE :		
OWNER ADDRESS :	ROAD 738 6.3 KM	PLANT AREA LOCATION :		COMPLIANCE CYCLE :	01	
	CAYEY	PR 00633	CITY :	CEDRO	POSTAL CODE :	PR
MAILING NAME :	PRASA		COUNTY :		PLANT TYPE :	C
MAILING ADDRESS :	PO BOX 7066 BO. QBERRO STATION		ADMIN REGION :	05	OWNER TYPE :	S
	SANTURCE	PR 00916	ADMIN DISTRICT :		FRDS COUNTY CODE :	

PLANT SERVICE AREA:

RESIDENTIAL:	COMPANY TOWN:	RECREATION :	MOBILE HOMES :	INSTITUTION :	SCHOOL :	OTHER AREA:
MOTEL :	RESTAURANT :	SERV. STATION:	CAMPGROUND :	PICNIC AREA :	LODGE :	
MARINA :	SKI RESORT :	BATHING :	VISITOR CENTER:	HWY. REST AREA:	AIRPORT:	

ACTIVE INDICATOR :	A	INITIAL DATE :	07/06/83	BEGIN DATE :	06/01/77	CONSECUTIVE INDICATOR :	0
POPULATION SERVED :	304	NUMBER OF SERVICES :	76	NUMBER OF METERS :	76	# OF CONSECUTIVE PWS :	
DESIGN CAPACITY :	20K	EMERGENCY POWER :	0K	STORAGE CAPACITY :	30K	MAXIMUM PRODUCTION :	15K
INTERSTATE CARRIER :	N	AVERAGE PRODUCTION :	3K	LAST SURVEY DATE :		LAST UPDATE DATE :	02/10/87
DEACTIVATION REASON :		DEACTIVATION DATE :		MANUAL FILE :		REGULATE BY :	B
FACILITY LATITUDE :	01805	FACILITY LONGITUDE :	06609	SMSA CODE :	7440	HYDROLOGICAL ID :	

STATE DISCRETIONARY DATA:

```

BACTERIOLOGICAL FLG:  L  MINIMUM NUMBER DAILY CHECKS:      NON-COMMUNITY SAMPLING FREQ:      SEASON:
MONTHLY MONITORING:      SAMPLES PER QUARTER:      MCL-HALT CHECK SAMPLE:      START: 00/00
% CHLORINE SUBSTITU:      TURBIDITY FLAG:  L  TURBIDITY LIMIT:      END: 00/00

```

CHEMICAL:

```

ORGANIC BEGIN PERIOD:      ORGANIC END PERIOD:      # OF TTHM SAMPLES:      TYPE : SACT  PHYS  INORG  ORG  RAD
AIR TEMPERATURE          :      NITRATE FREQUENCY :      # OF PLANTS           :      CONTROL:  N    N    N    N    N
TTHM SAMPLE FREQ :

```

RADIOACTIVE:

MONITORING FLAG : 3 BETA FREQUENCY MONTHS: MONITOR GROSS ALPHA: MONITOR RADIUM MONTHS : RADIOACTIVE FLAG: 4
GROUND WATER MONITOR: 5 OF SAMPLES PER YEAR: NUCLEAR FACILITY : N NUCLEAR FACILITY TYPES:
FACILITY CONTAMINANT ID:
SAMPLING FREQUENCY :

SOURCE AND/OR ENTRY POINT INFORMATION:
(SRC) (EPT)

TREATMENTS

# OF	BASIN	SELLER	ENTRY POINT	TURB	TURB	R E A D L R F S D M A S H S S	E R O F I O Q A R M L T E E E
WELLS	AVAL	ID	ID	FLAG	UNITS	A C G I T R T T N O O I R 1 2 3	
TYPE NAME	CODE	LATITUDE	LONGITUDE				
SRC CEDRO CREEK	S			P			Y
SRC LA VEGA 3 WELL	G			P			
SRC CEDRO	S	0180524	0660336	P			Y
SRC VEGA	S	0180605	0660753	P			

LOCATE STATEMENT:

LOCATE (0) C100 WH NK C103 EQ S AND NK C194 EQ A AND C2 EQ PR:

REFERENCE 5

COMMONWEALTH OF PUERTO RICO
AQUEDUCT AND SEWER
AUTHORITY

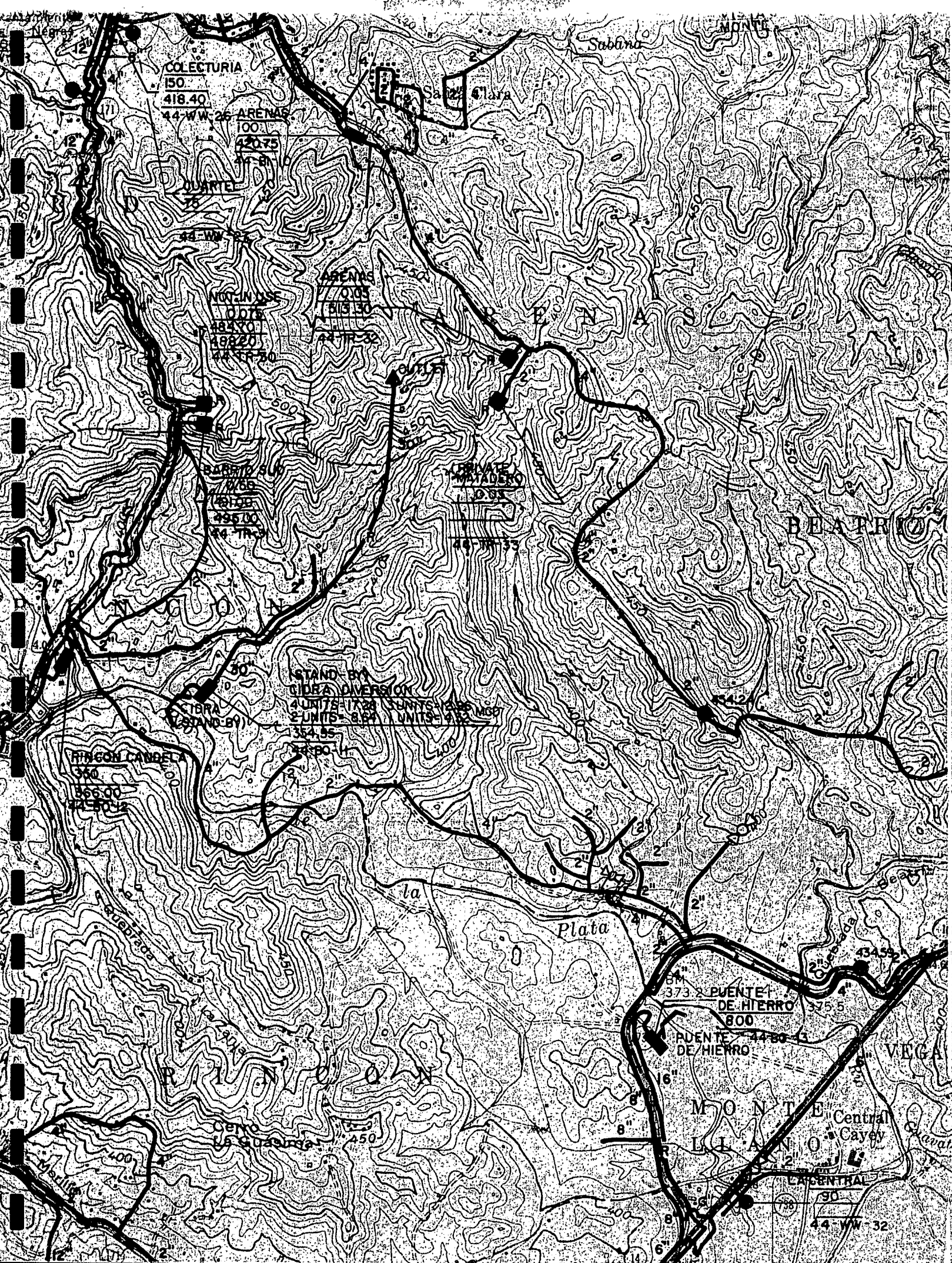
WATER SUPPLY SYSTEMS MAP
COMERIO

Santiago Vázquez
Flaherty • Giavara  Estado Libre Asociado de Puerto Rico
403 PARQUE STREET, SAN JUAN, PUERTO RICO 00972-2323 726-2324 AUTORIDAD DE ACUEDUCTOS Y ALCANTARILLADOS

JAN. 1983
DATE

44

MAP. NUMBER



COMMONWEALTH OF PUERTO RICO
AQUEDUCT AND SEWER
AUTHORITY

WATER SUPPLY SYSTEMS MAP
CAYEY

Santiago Vázquez
Fianerty • Giavara

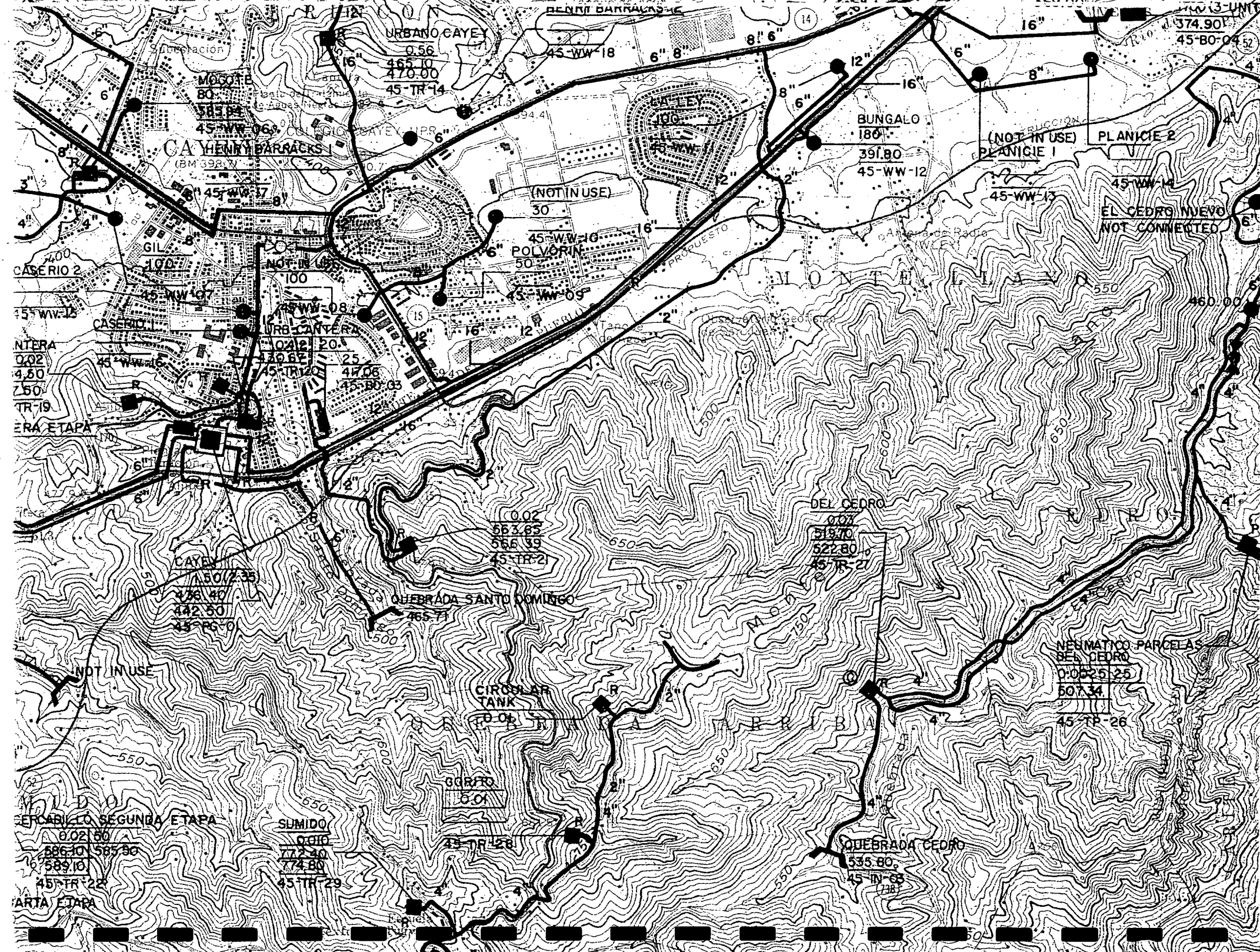


Estado Libre Asociado de Puerto Rico
403 PARQUE STREET, SAN JUAN, PUERTO RICO 809/728-2323, 728-2324 AUTORIDAD DE ACUEDUCTOS Y ALCANTARILLADOS

JAN. 1983
DATE

45

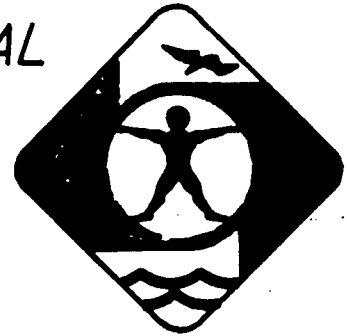
MAP NUMBER



REFERENCE 6

COMMONWEALTH OF PUERTO RICO/OFFICE OF THE GOVERNOR

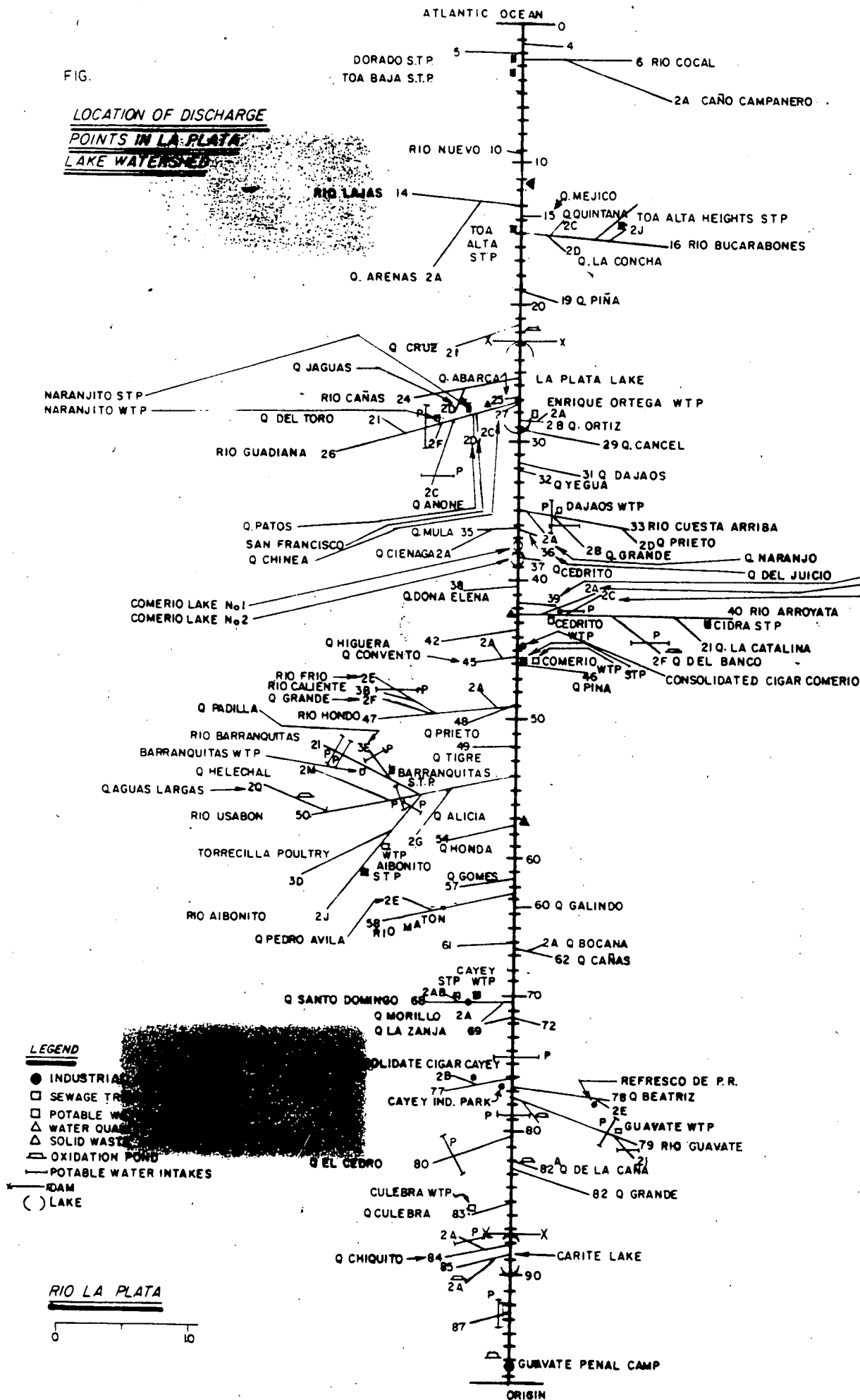
*ENVIRONMENTAL
QUALITY BOARD*



*GOALS AND PROGRESS OF STATEWIDE
WATER QUALITY MANAGEMENT PLANNING
PUERTO RICO 1988-1989*

*MAY 1990
REVISED EDITION*

LOCATION OF DISCHARGE
POINTS IN LA PLATA
LAKE WATERSHED



10/24/90

USE SUPPORT STATUS REPORT - Report 08

PAGE 1

WATERBODY ID # : PRER0074M

WATERBODY NAME : RIO LA PLATA

WATERBODY TYPE : RIVER SIZE : 39.70 (STREAM MILES)

BASIN : RIO LA PLATA

ASSESSMENT DATE : 9004

----- OVERALL ASSESSMENT -----

ASSESSMENT CATEGORY : E

ASSESSMENT TYPE : 1

----- USE SUPPORT STATUS (SIZE IN STREAM MILES) -----

FULLY SUPPORTED : 7.20

THREATENED :

PARTIALLY SUPPORTED : NOT SUPPORTED : 32.50

NOT ASSESSED :

----- DESIGNATED USES -----

NO DATA

----- CONTROLS -----

NO DATA

----- RESTORATION -----

NO DATA

----- NONATTAINMENT CAUSES AND SOURCES -----

CAUSES	SIZE	MAG	SOURCES	SIZE	MAG
0100-UNKNOWN TOXICITY	9.70	M	0200-MUNIC PT. SOURCES	1.50	M
0500-METALS	3.30	S	0200-MUNIC PT. SOURCES	1.50	H
0800-OTHER INORGANICS	3.20	S	0100-INDUS PT. SOURCES	6.00	M
0900-NUTRIENTS	3.30	S	6300-LANDFILLS	9.00	H
1200-ORGANIC ENRICH/DO	3.30	S	1800-ANIMAL MGNT AREAS	5.40	M
1700-PATHOGEN INDICATORS	9.70	M	1200-IRRIGATED CROPS	1.90	S
			6300-LANDFILLS	5.40	M
			6200-WASTEWATER	1.80	S

10/24/90 DESIGNATED USE SUPPORT SUMMARY FOR PR - Report 01 PAGE 1
RIVER (all size units in STREAM MILES)

TOTAL NUMBER OF RIVER WATERBODIES DESIGNATED : 1 SIZE : 39.70

TOTAL NUMBER OF RIVER WATERBODIES ASSESSED : 1

TOTAL NUMBER MONITORED : 0

TOTAL NUMBER EVALUATED : 1

DEGREE OF USE SUPPORT	ASSESSMENT BASIS		TOTAL
	EVALUATED	MONITORED	
SIZE FULLY SUPPORTED	7.20	.00	7.20
SIZE THREATENED	.00	.00	.00
SIZE PARTIALLY SUPPORTING	.00	.00	.00
SIZE NOT SUPPORTING	32.50	.00	32.50
TOTAL SIZE ASSESSED	39.70	.00	39.70

REFERENCE 7

AUTORIDAD DE ACUEDUCTOS Y ALCANTARILLADOS
OFICINA DE RECURSOS DE AGUA
SISTEMA DE POZOS

7/12/66

REGION: GUAYAMA

POZO NUMERO: 44W040

FECHA ACTUALIZACION: SEP65

NOMBRE DEL POZO: 9 LA CENTRAL 2

PUEBLO: CAYEY

REGION: GUAYAMA

ZONA: CAYEY

LARGO COLUMNA DE LA BOMBA (PIES): 120

PROFUNDIDAD (PIES): 167

NIVEL (PIES)

ESTATICO: 10 FECHA: 16JUN59

DINAMICO: 136 FECHA: 16JUL59

PRODUCCION (GPM)

ORIGINAL: 148 FECHA:

ACTUAL: 0 FECHA:

FORMA DE MEDIR:

FORMACION GEOLOGICA: 1 CV=5 BARRO AM-15 PI GRIS-43 BARRO BROWN
ARENGSO-95 ROCA AZUL-4 ROCA AZUL LURA

CONTAMINANTES MAS COMUNES (PPM)

CONTAMINANTES	FECHA	CONTAMINANTES	FECHA	CONTAMINANTES	FECHA
CLORURO:	35 16JUN59	NITRITO:	.09 16JUN59	NITRATO:	35 16JUN59
HIERRO:	0 16JUN59	MANGANESO:	0 16JUN59	SULFATO:	28 16JUN59
TDS:	457 16JUN59			COLI:	43 16SEP59

OBSERVACIONES: VENAS AGUAS 50-54-80-89 PIES

ULTIMA: A

STATUS: ABANDONADO (CIROS)

POZO NUMERO: 45W00

FECHA ACTUALIZACION: SEP65

NOMBRE DEL POZO: PLANICIE 2 POZO "A"

PUEBLO: CAYEY

REGION: GUAYAMA

ZONA: CAYEY

LARGO COLUMNA DE LA BOMBA (PIES): 80

PROFUNDIDAD (PIES): 120

NIVEL (PIES)

ESTATICO: 21 FECHA: 13MAR74

DINAMICO: 73 FECHA: 13MAR74

PRODUCCION (GPM)

ORIGINAL: 73 FECHA:

ACTUAL: 0 FECHA:

FORMA DE MEDIR:

FORMACION GEOLOGICA: 45 BARRO AMARILLO-20 BARRO PIEDRA-30
PIEDRA TOSCA-25 PIEDRA AZUL

CONTAMINANTES MAS COMUNES (PPM)

CONTAMINANTES	FECHA	CONTAMINANTES	FECHA	CONTAMINANTES	FECHA
CLORURO:		NITRITO:		NITRATO:	
HIERRO:		MANGANESO:		SULFATO:	

OBSERVACIONES: ALTO SOLIDOS-NO DATA CONTAMINACION

REFERENCE 8

	Cat/Long	Municipio	BWS Number	Well Name	Depth of Well (ft)	Depth to Water (ft)	Pumping Rate(GPM)	Temp	SK	TCE	PCE	CHCl ₃
206	181306655014	LAS PIEDRAS	0005256	BOQUERON #2	98	31	100	25.5	570	ND	ND	ND
207	181755655502	CAROLINA	0002611	MASA #400	375	-	-	26.0	666	ND	ND	ND
208	181550655921	GURABO	0005096	GURABO #3	160	37	350*	25.5	510	ND	ND	ND
209	181548655929	GURABO	0005096	GURABO #1	125	60	100	25.0	1150	ND	ND	ND
210	181528660216	CAGUAS	0005066	BAIROA A	125	46	150*	26.5	768	ND	ND	440
								26.5	454	ND	ND	96
211	181547660225	CAGUAS	0005066	BAIROA C	120	70	205	26.5	423	ND	ND	4.9
								-	-	ND	ND	2.3
212	181538660213	CAGUAS	0005066	BAIROA VIEJO	-	-	-	25.5	294	ND	ND	120
								26.0	480	ND	ND	ND
213	181508660419	CAGUAS	0005056	LAS CAROLINAS	290	40	150	26.5	436	ND	ND	ND
214	181505660404	CAGUAS	0005056	LAS CAROLINAS #1	65	-	10*	25.5	772	ND	ND	ND
215	180737660737	CAYEY	0004635	MONTELLANOS	250	90	75*	23.5	650	<.20	.30	1.3
216	180740660807	CAYEY	0004635	LA CENTRAL #9	167	136	148*	24.5	808	ND	ND	ND
217	180648660900	CAYEY	0004635	RADIO LEY	205	108	110	24.0	808	ND	.50	1.5
										ND	.75	23
										ND	.75	23
										ND	.65	22
218	180712660932	CAYEY	0004635	HENRI BARRACKS #2	-	-	-	24.5	808	.30	<.20	.40
								24.0	791	.30	<.20	.40
219	180644660928	CAYEY	0004635	POLVORIN #2	167	-	108*	24.0	791	107	12	6.1
								24.0	816	82	11	12
220	180708660937	CAYEY	0004635	HENRY BARRACKS #1	-	-	-	25.0	680	2.8	<.20	3.5
221	180642660951	CAYEY	0004635	CACERIO VIEJO	150	-	120	24.5	866	.90	7.2	1.9
222	180714660807	CAYEY	0004635	MOGOTE	140	59	70	25.0	990	ND	ND	.60
223	180708661006	CAYEY	0004625	FINCA BOSCH	100	60	133*	25.0	850	ND	ND	.30
224	180812661236	CAYEY	0004685	MATON #1	200	75	20*	25.0	600	ND	ND	.40
225	180721661222	CAYEY	0004685	MATON #3	-	-	-			ND	ND	ND
226	181033660440	CIDRA	0004695	CALLE BARDORIOTY	200	145	250*	24.5	770	ND	ND	ND
227	180945660652	CIDRA	0004695	ZAPERA #1	168	31	150*	23.5	388	ND	ND	ND
228	181016660927	CIDRA	0004695	VILLA DEL CARMEN	300	107	250*	23.5	444	ND	ND	ND
229	181147661024	CIDRA	0004695	CEIBA	-	-	60	23.5	566	ND	ND	ND
230	181017661042	CIDRA	0004695	FRENTE CEMENTERIO	-	-	-	24.0	505	ND	ND	ND
231	181423660938	AGUAS BUENAS	0005032	BAYAMONCITO	-	-	-	25.0	381	ND	ND	ND
232	181336661035	COMERIO	0004715	NARANJO	230	10	100*	23.0	208	ND	ND	ND
233	181457661357	COMERIO	0004705	PASARELL-CASERIO	230	100	30	26.0	735	54	ND	ND
										52	ND	ND
								26.0	667	35	<.20	ND

CONCENTRATION OF THE MOST COMMON VOLATILE SYNTHETIC ORGANICS CHEMICAL AT PUBLIC WATER-SUPPLY WELLS THROUGHOUT PUERTO RICO NOV. 34-MAY. 1985

REFERENCE 9

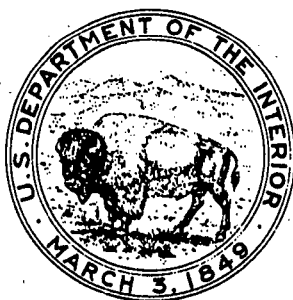
DEPARTMENT OF THE INTERIOR
UNITED STATES GEOLOGICAL SURVEY

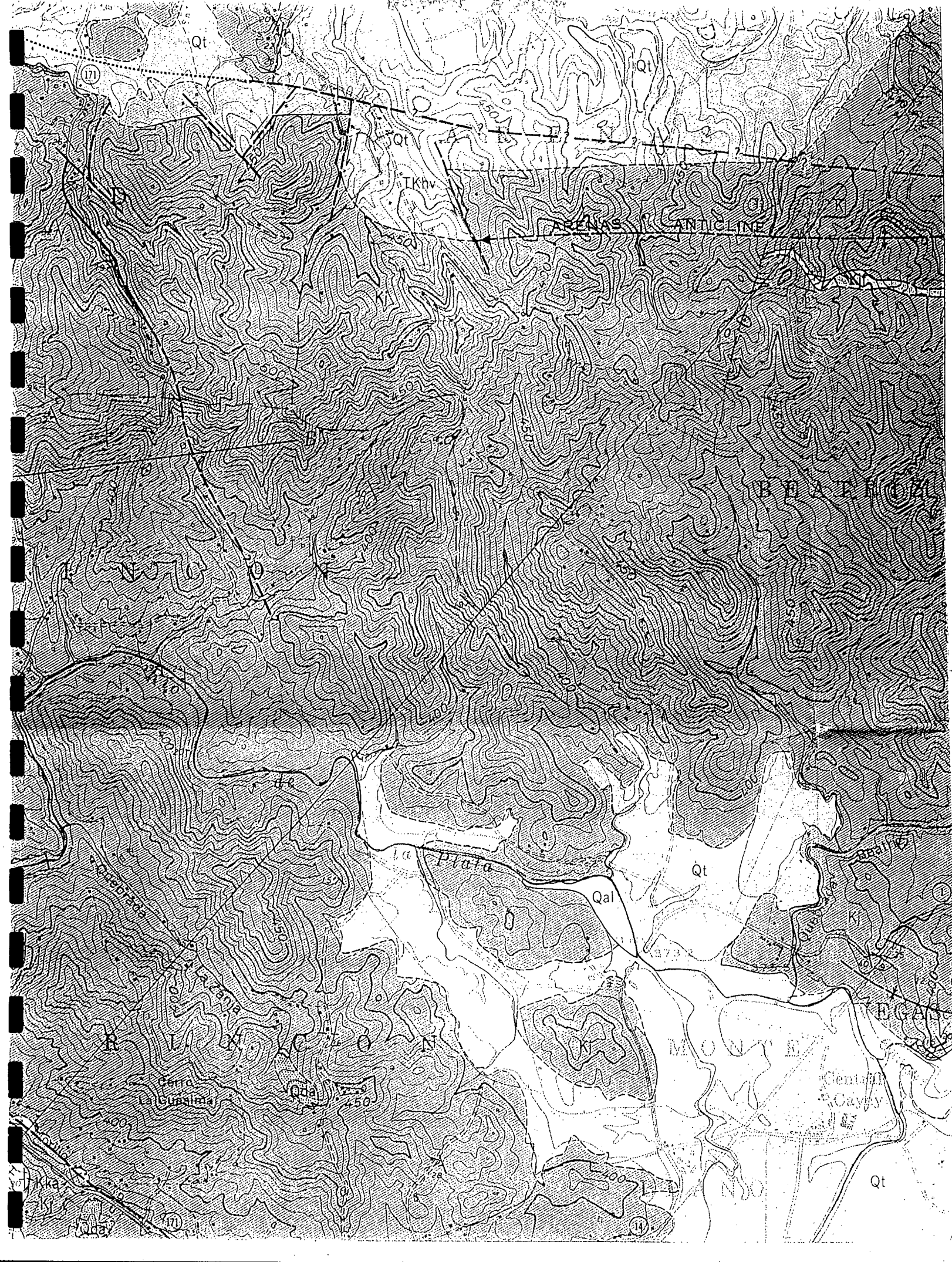
GEOLOGY OF THE COMERIO QUADRANGLE,
PUERTO RICO

By

Maurice H. Pease, Jr., and Reginald P. Briggs

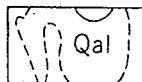
MISCELLANEOUS GEOLOGIC INVESTIGATIONS
MAP I-320





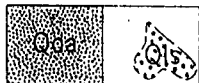
EXPLANATION

STRATIFIED ROCKS



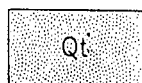
Alluvial deposits

Unconsolidated gravel, sand, and silt including large cobbles and boulders of volcanic rock; restricted to lowest deposits adjacent to present stream channels



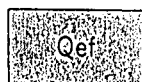
Deposits of debris-avalanche and landslide

Debris avalanche deposits, Qda, are mixed earth and rock; landslide deposits, Qls, are coherent blocks derived from steep slopes



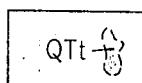
Terrace deposits

Unconsolidated sand, gravel, and silt including large cobbles and boulders of volcanic rock; restricted to deposits generally above the level of present stream action



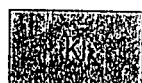
Earth-flow deposits

Deposits of clayey earth and rock fragments containing siliceous boulders as large as 25 cubic meters; restricted, in Comerio quadrangle, to the slopes of Cerro La Tiza



Older terrace deposits

Remnant deposits of consolidated gravel occurring at about 500 meters above sea level



Formation L

Dominantly massive porphyritic amygdaloidal flow; also flow breccia, but few clastic rocks



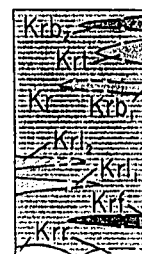
Robles formation

Chiefly thinly stratified fine-grained sedimentary rocks, Kr, but includes fine-grained volcanic breccia, Krb, and Krb, and a lava flow, Krl. Also includes the Las Tetas lava member, Krt; the Lapa lava member, lower flow, Krl, and upper flow, Krl; and the Río Matón limestone member, Krr, a thin discontinuous unit at the base of the formation



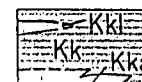
Formation L

Dominantly massive porphyritic amygdaloidal flow; also flow breccia, but few clastic rocks



Robles formation

Chiefly thinly stratified fine-grained sedimentary rocks, Kr, but includes fine-grained volcanic breccia, Krb, and Krb, and a lava flow, Krl. Also includes the Las Tetas lava member, Krt; the Lapa lava member, lower flow, Krl, and upper flow, Krl; and the Río Matón limestone member, Krr, a thin discontinuous unit at the base of the formation



Formation K

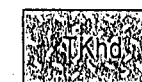
Chiefly crudely stratified coarsely clastic volcanic breccia; intercalated with lava flows, volcanic conglomerate, massive tuff and a few layers of bedded fine grained rocks; thin lenticular bodies of impure limestone, tuff, and limestone breccia, Kkl; Aguas Buenas limestone member, Kka, at the base of formation



Formation J

Principally massive volcanic breccia and lava flows. Contains layers of poorly stratified tuff and volcanic conglomerate; fine-grained bedded rock occurs locally; a thin limestone lense, Kjl, and a lava flow, Kji, delineated on the geologic map

INTRUSIVE ROCKS



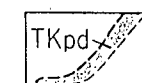
Hornblende diorite

Light olive-gray to medium-gray, fine-grained, generally porphyritic rock; phenocrysts of plagioclase and hornblende



Hornblende porphyry

Dark-colored rock characterized by hornblende phenocrysts as much as 15 millimeters in length



Pyroxene diorite

Medium-gray to pinkish-gray fine-grained holocrystalline rock composed chiefly of plagioclase and pyroxene

REFERENCE 10

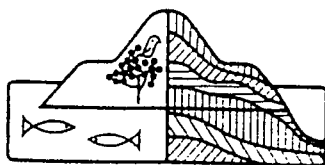
CRITICAL WILDLIFE AREAS OF PUERTO RICO

DEPARTMENT OF NATURAL RESOURCES
AREA OF PLANNING AND RESOURCES ANALYSIS
Division of Coastal Resources and Wildlife Planning

Fred V. Soltero Harrington
Secretary

Gabriel del Toro
Assistant Secretary of Planning

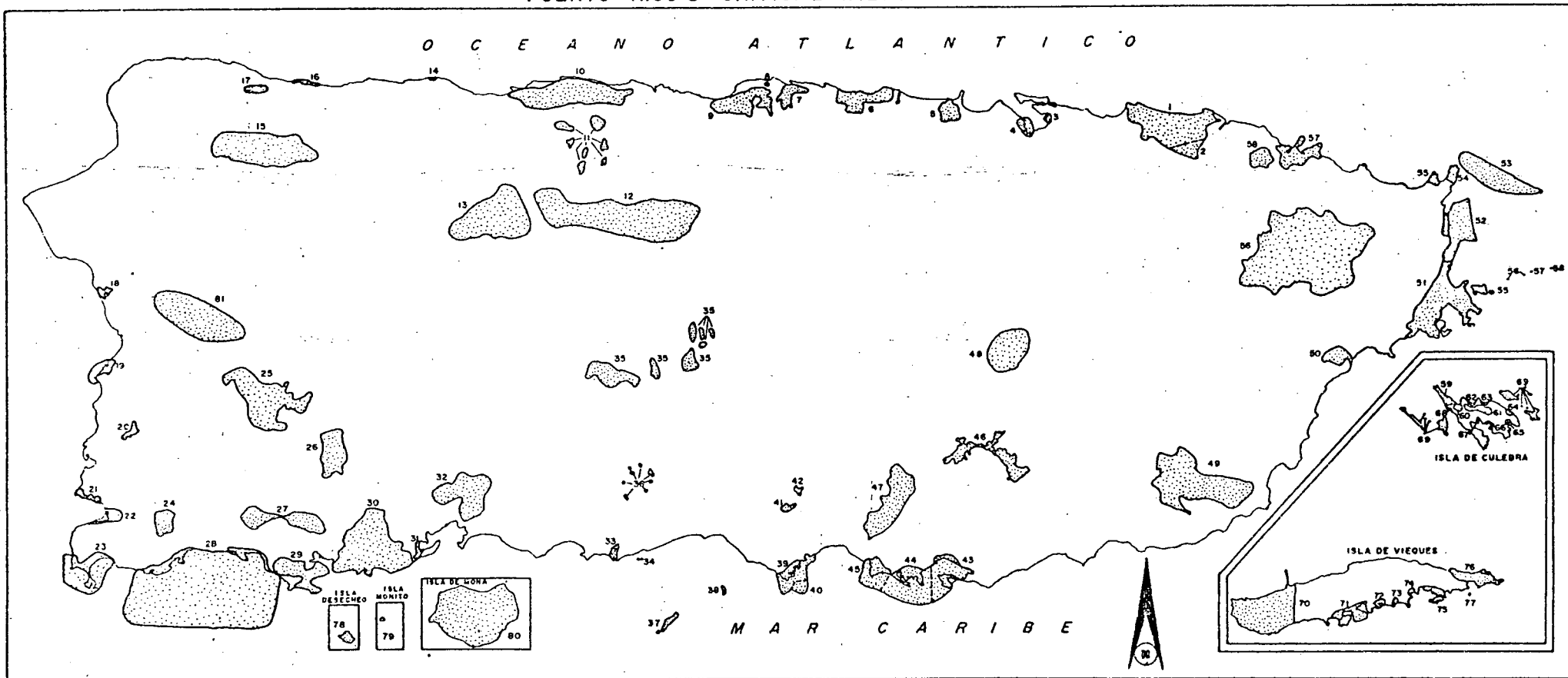
September 1979



46. Cerro del Gato and Associated Areas - (Cayey)

This area covers the extremely restricted range of one of our most endangered treefrogs. The species is found nowhere else in the world and is even rare within its limited range marked on the accompanying map. This species, the Golden Coqui (Eleutherodactylus jasper) which is in the process of being protected by the federal Endangered Species Act, happens to be not only the rarest, but also the most beautiful of our frogs as well as the most unusual. The localities where it occurs are positively prime wildlife areas and steps should be taken to acquire and fence off critical portions of Golden Coqui habitat. Since much of the region where this frog survives is subject to possible destruction this action should be taken immediately. Other beautiful frogs with limited distributions in Panama and Trinidad are on the verge of extinction due to intensive collecting. Collecting of the Golden Coqui should be prohibited except by special permit and its habitat guarded against illegal poaching.

PUERTO RICO'S CRITICAL WILDLIFE AREAS



LEGEND :

- 1 - TORRECILLA - PIÑONES
- 2 - TORRECILLA ALTA
- 3 - CONSTITUTION BRIDGE MUDFLATS
- 4 - PALO SECO PENINSULA
- 5 - SAN PEDRO SWAMP
- 6 - LAKES AND FOREST OF DORADO BEACH AND CERROMAN BEACH HOTELS
- 7 - CIBUCO SWAMP
- 8 - LAKE PUERTO NUEVO
- 9 - TORTUGUERO LAGOON, RICA LAKE, AND CABO CARIBE SWAMP
- 10 - TIBURONES SWAMP
- 11 - CAMPALACHE FOREST
- 12 - SABANA MOTOS - NARO VIEJO KARST
- 13 - RIO ABAJO KARST
- 14 - CARRIZALES MANGROVE
- 15 - GUAJATACA KARST
- 16 - GUAJATACA CLIFFS
- 17 - BARRIO COTO
- 18 - SABANETAS SWAMP
- 19 - GUANAJIBO MANGROVE AND ADJACENT
- 20 - CUEVA LAGOON

- 21 - GUANIQUELLA
- 22 - BOQUERON REFUGE
- 23 - CABO ROJO SALTFLATS AND ADJACENT AREAS
- 24 - CARTAGENA LAGOON
- 25 - MARICAO STATE FOREST
- 26 - SUSUA STATE FOREST AND ADJACENT LANDS
- 27 - GUANICA LAGOON
- 28 - LA PARGUERA
- 29 - GUANICA STATE FOREST - WEST
- 30 - GUANICA STATE FOREST - EAST AND ADJACENT LANDS
- 31 - LLUVERAS
- 32 - GUAYANILLA HILLS
- 33 - CABULLON MANGROVE
- 34 - FRIOS CAYS
- 35 - TORO NEGRO STATE FOREST
- 36 - SERRALLES
- 37 - CAJA DE MUERTOS AND MORRILLITO ISLAND
- 38 - BERBERIA CAY
- 39 - PUNTA PETRONA MANGROVE
- 40 - CARACOLES

- 41 - COAMO RESERVOIR
- 42 - BAÑOS DE COAMO
- 43 - PUNTA POZUELO
- 44 - MAR NEGRO
- 45 - PUNTA ARENAS
- 46 - CERRO DEL GATO AND ASSOCIATED AREAS
- 47 - SALINAS TRAINING AREA
- 48 - CIDRA LAKE
- 49 - PANDURA MOUNTAIN RANGE
- 50 - HUMACAO SWAMP
- 51 - ROOSEVELT-ROADS-NAVAL BASE
- 52 - FAJARDO COASTLINE
- 53 - FAJARDO CORDILLERA
- 54 - GRANDE LAGOON AND ADJACENT LANDS
- 55 - AGUAS PRIETAS LAGOON
- 56 - LUQUILLO MOUNTAINS
- 57 - ENSENADA COMEZON
- 58 - CIENAGA BAJA
- 59 - FLAMENCO PENINSULA
- 60 - FLAMENCO LAGOON

- 61 - RESACA MOUNTAIN
- 62 - RESACA BEACH
- 63 - BRAVA BEACH
- 64 - LARGA BEACH AND ZONI LAGOON
- 65 - PUERTO DEL MANGLAR
- 66 - LOS CAÑOS
- 67 - CEMENTERIO BAY
- 68 - CORNELIUS LAGOON
- 69 - CULEBRA'S SURROUNDING ISLETS
- 70 - WEST VIEQUES
- 71 - ENSENADA SOMBE SWAMP, MOSQUITO BAY AND FERRO BAY
- 72 - TAPON BAY
- 73 - CHIVA SWAMP
- 74 - YANUEL LAGOON
- 75 - ENSENADA HONDA MANGROVE
- 76 - EAST TIP OF VIEQUES
- 77 - CONEJO ISLAND
- 78 - DESECHEO ISLAND
- 79 - MONITO ISLAND
- 80 - MONA ISLAND

- 81 - CASEI RIVER

REFERENCE 11

HOURLY PRECIPITATION DATA

PUERTO RICO AND VIRGIN ISLANDS

JANUARY 1987

VOLUME 17 NUMBER 1



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NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION AND
IS COMPILED FROM INFORMATION RECEIVED AT THE NATIONAL
CLIMATIC DATA CENTER, ASHEVILLE, NORTH CAROLINA."
28801

Kenneth D. Haden

DIRECTOR
NATIONAL CLIMATIC DATA CENTER

noaa

NATIONAL
OCEANIC AND
ATMOSPHERIC ADMINISTRATION

NATIONAL
ENVIRONMENTAL SATELLITE, DATA
AND INFORMATION SERVICE

NATIONAL
CLIMATIC DATA CENTER
ASHEVILLE, NORTH CAROLINA

REFERENCE 12

CLIMATOLOGICAL DATA ANNUAL SUMMARY

PUERTO RICO AND VIRGIN ISLANDS
1987

VOLUME 33 NUMBER 13



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28801

Kenneth D. Haeber

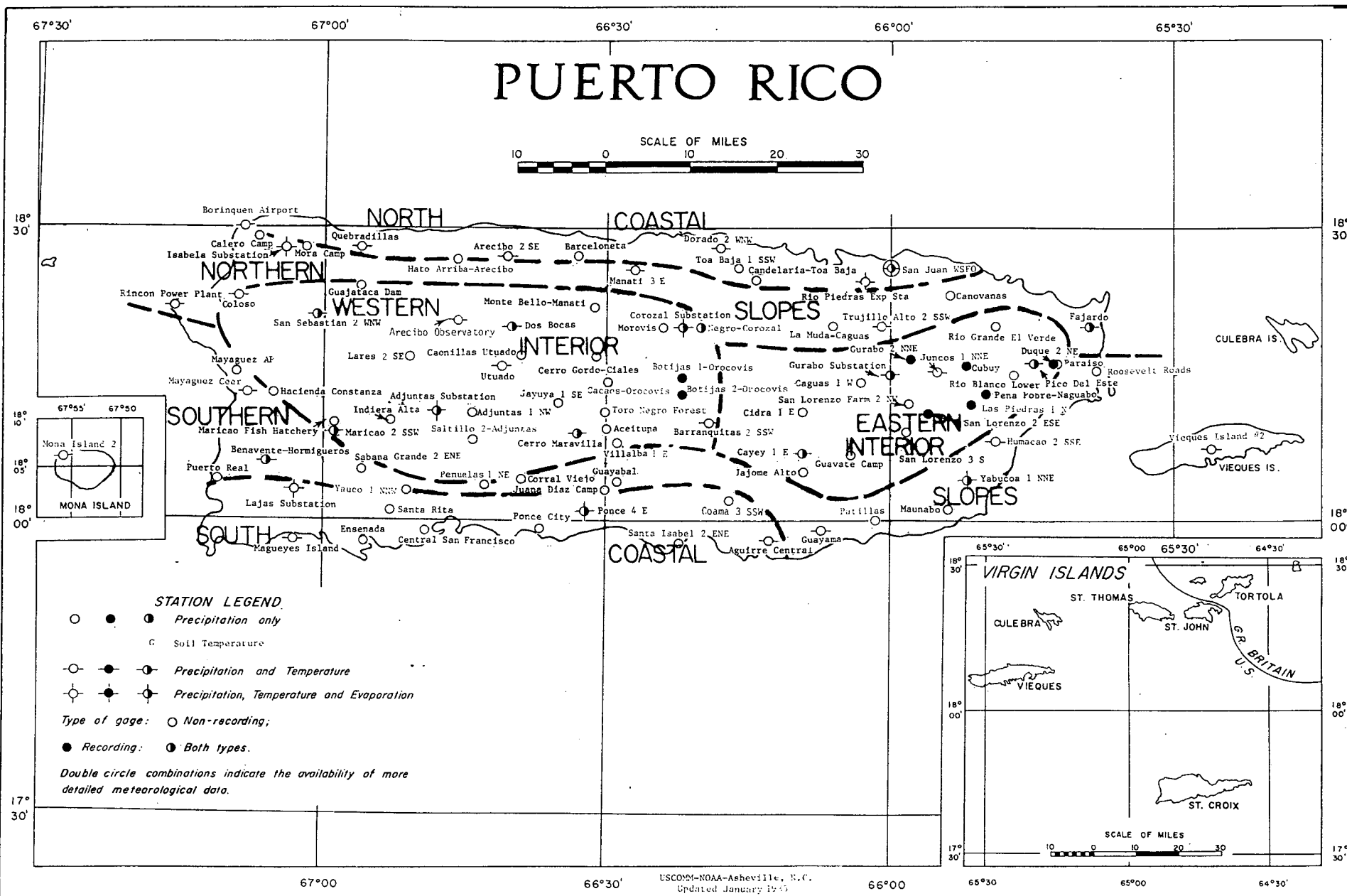
DIRECTOR
NATIONAL CLIMATIC DATA CENTER

noaa

NATIONAL
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ATMOSPHERIC ADMINISTRATION

NATIONAL
ENVIRONMENTAL SATELLITE, DATA
AND INFORMATION SERVICE

NATIONAL
CLIMATIC DATA CENTER
ASHEVILLE NORTH CAROLINA



REFERENCE 13

Uncontrolled Hazardous Waste Site Ranking System

A Users Manual (HW-10)

Originally Published in
the July 10, 1982, *Federal Register*

United States
Environmental Protection
Agency

1984

REFERENCE 14

United States
Environmental Protection
Agency

Hazardous Site
Evaluation Division
Washington DC 20460

May 1988



PreScore User's Manual

DRAFT

REFERENCE 15

Olay Company, Inc.

December 6, 1990

Ms. Johanna Padró Irizarri
Environmental Science Specialist
Air Quality Area
Environmental Quality Board
P.O. Box 11488
Santurce, Puerto Rico 00910

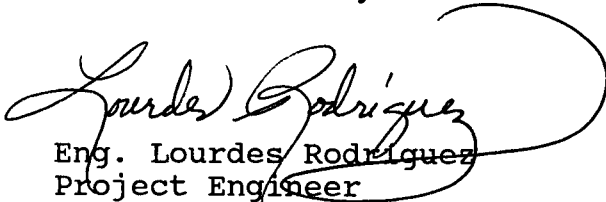
Dear Ms. Padró:

Enclosed please find the information you requested for your PA. Note that, even though I spent a great amount of my time on this investigation, some of the information were not available at this time in our files.

Please keep this report strictly confidential and in case you need further help, do not hesitate to contact me.

Cordially,

OLAY COMPANY, INC.


Eng. Lourdes Rodriguez
Project Engineer

Enclosure

/rr

Olay Company, Inc.
Call Box 7000
Cayey, Puerto Rico 00634
Telephone: (809) 738-2191

A Procter & Gamble Company

OLAY COMPANY, INC.

HISTORICAL BACKGROUND

Background

Cayey's facility started construction on October 1974 and was inaugurated on November 13 of the same year. The initial facility consisted of two buildings. A 38,000 square feet (Building "B") was used exclusively by Merrell-National Laboratories, Inc. for the production of Tenuate and Tenuate Dospan (two anorexic tablets). Sales at that time were \$20MM for the two ethical products listed.

The other separate building (Building "A") had an area of 65,000 square feet and was designed for the manufacturing of Sinex and Vicks Inhaler. Combined sales of these two products were approximately \$22 million.

On July 1975, after the first expansion of the Vicks Building A, production of the Oil of Olay line began in Cayey. Sales of Olay at that time were approximately \$18MM. Building C, which is our main Warehouse (60,000 square feet), was constructed in 1980.

From the period 1975 to 1981, additional products were transferred to Cayey. These were the following: Sinex Long-Acting, Quinamm (a medication for leg cramps), Bendectin (a coated tablet for morning sickness of pregnant women) and Night of Olay.

In 1981 the Merrell Division worldwide business was sold to the Dow Chemical Company. The Cayey Merrell building (Building "B") was, therefore, transferred to Dow and operated under their responsibility for one year. Due to Dow's decision to liquidate their business in Puerto Rico, Olay Company, Inc. re-purchased the building from Dow in 1983.

Following this transaction, RVI used the solid dosage facility for the production of Percogesic, Daycare, Headway and Dilone. Due to low utilization of the building, i.e., we entered into a contract packaging agreement with McNeil which represented half a million dollar profits per year. Contract lasted five years.

In 1984 Vicks Vaporub was transferred to Cayey. Additionally in 1980 three Vidal Sassoon products were transferred to Cayey. P&G acquisition of RVI in 1985 represented the manufacturing of additional products that were transferred to our facility due to our capacity to absorb such products: Dramamine (1986) and Secret Cream (1988).

Finally, Olay Beauty Cream production started in 1986 and Olay for Sensitive Skin in 1988. Production of Icy Hot started in February 1990.

INFORMATION ABOUT WASTE WATER TREATMENT PLANT OPERATIONS

Olay Company, Inc. Waste Water Treatment Plant started operations in 1975. It was originally designed to process a 15,000 GPD effluent consisting of sanitary waste equipment wash-down and miscellaneous (kitchen/cafeteria, deionizer backwash regeneration, QC laboratory effluent). It would provide secondary treatment in an 8 hours period basis and was designed to meet EQB of Puerto Rico regulations.

Sewage Treatment Plant is basically of the activated sludge type, with original capacity of 90 - 94 % removal of BOD₅ and 90 - 94% removal of Suspended Solids. During that time, WWTP processed waters coming from washdowns on equipments and floors containing the products Te 25Mg, Si and Inhalers medications (See components on Attachment I).

For 1978 - 1979 the products listed in Attachment II were manufactured at OCI. Basically, actual products manufactured are: Olay (several brands), Sassoon, Secret, Vaporub, Icy Hot, Inhalers, Sinex, Day Care and Dramamine. Wash-down waters from these products are treated in the plant, being Olay's of greater volume.

BACKGROUND OF ORIGINAL WWTP DISCHARGE

From 1975 up to 1977, OCI Secondary Sewage Treatment Plant discharged to a tile - drain field. In order to discharge to an existing storm sewer which emptied into an intermittent creek (no name) leading to La Plata River, a Tertiary Filter Plant was added. Initial application for a NPDES Permit was submitted on October, 1975 and re-submitted on December, 1977 due to an apparent mis-routing. NPDES No. PR0023469 was finally assigned to our facilities by middle - December, 1977. Analysis of effluent is included in Attachment III.

Olay Company, Inc. WWTP effluent was finally connected to the Cayey Municipal Plant operated by PRASA by May, 1982.

SIGNIFICANT INCIDENTS/SPILLS

Almost twelve years ago an explosion occurred in Quinamm manufacturing area. Certain solvent used in coating process ignited causing an explosion with two injured persons. Such product was sold to Dow Chemical shortly after the incident. No written information of this incident was found. Last September 29, 1989 major spill occurred in OCI history. Approximately 60 gallons of kerosene fuel oil reached the storm water server and ended up in an open pluvial ditch near Road 735, Km. 2.3. Fortunately, La Plata river was not contaminated avoiding human health injuries.

Last October 2, 1990 a Laboratory Hazardous Waste Spill occurred accidentally at OCI Dissolved Air Flotation unit. Waste (organic solvents) was 95% controlled within the Company's premises, even though the incident was discovered almost 24 hours later.

**HAZARDOUS WASTE/RAW MATERIAL
STORAGE CAGE (FLAMMABLE SUBSTANCES)**

According to our files, the flammable storage cage was constructed by 1981 - 1982. No information is available relating to where such substances were stored before that date.

4.4 Q. C. Lab has an effluent of 300 GPD after it passes through a dilution pit.

4.5 WASHDOWN on equipments and floors in Pharmaceutical Plant Buildings.

4.5-1 Building I has a central vacuum cleaning system for all the manufacturing areas to use on equipments and floors, therefore, the washdown coming from these areas is going to include a minor trace (4 kg. total) of the product. One day the product would be Te 25 Mg. (components: Diethyl Propion Hydrochloride with Tartaric Acid; Tartaric Acid; Corn Starch Instant; Magnesium Stearate; Talc; Lactose Starch Green; Lactose White); another day the product could be Te 75 Mg. (components: Tartaric Acid; Mannitol Powder; Zinc Stearate; Carboxy Polymethylene; Polyvinyl Pyrrolidone). In either case the flow is going to be 5,000 GAL per 8 hour shift. 5000 + 10,000

4.5-2 Building II has a portable vacuum system for the same purpose as established on Building I and washdown of this area is going to include minor trace (1/2 gal.) of Si. & inhalers medications (1 pt.) Components of Si. are: Purified Water, USP (deionized); Tyloxapol (Emulsifier 90); Dried Sodium Phosphate, NF; Monobasic Potassium Phosphate, NF; Methapyrilene Hydrochloride, NF; Sodium Chloride, Dextritic; Thimerosal, NF; Cetylpyridinium Chloride, NF;

Phenylephrine Hydrochloride, USP; Menthol, USP;

Camphor, Methyl Salicylate, USP; Eucalyptol.

Components of inhalers are: L-Desoxyephedrine;

Camphor, USP; Menthol USP; Methyl Salicylate, USP;

Bornyl Acetate, Laevo; Lavender Oil, NF. The flow will

be 2,000 GAL per 8 hour shift.

5. REGULATIONS

5.1 Receiving streams are classified by E.Q.B. regulations for the control of water pollution as water currents; (see section 6.7 copy herewith attached of E.Q.B. Regulations).

5.2 Any other Federal regulation which to the acknowledge of the manufacturer is more restrictive.

6. EFFLUENTS

6.1 Secondary treatment with chlorination is requested (as an alternate add) (See Section 6.7 Class Water Currents herewith attached).

6.1-1 The process should obtain a minimum removal efficiency of an 85% in BOD; 90% in suspended solids; 95% in bacterias; 35% of detergents.

VIII. List of Products Manufactured and annual quantities:

<u>MNLI (Bottles)</u>	<u>Product</u>	<u>1978-79 Budget</u>
	Tenuate 25 mg 100's	193,000
	25 mg 1000's	3,300
	Tenuate Dospan 100's	316,400
	250's	269,500
	*Tenuate 25 mg Samples 6's	735,000
	*Tenuate Dospan Sample 2's	3,500,000
	Quinamm 100's	382,200
	500's	25,200
	*Quinamm Samples 1's	1,150,000
	Bendectin 100's	1,200,000
	*Bendectin Samples 4's	1,150,000
<u>OCI (Dozens)</u>		
	Olay 4 oz.	1,317,000
	Olay 6 oz.	410,000
	Olay Night Cream	81,000
<u>VI (Dozens)</u>		
	Sinex 1/2 Oz.	432,000
	Sinex 1 Oz.	89,000
	Sinex Long Acting 1/2 Oz.	313,000
	Sinex Long Acting 1 Oz.	43,000
	Inhalers Carded	93,000
	Inhalers SSP	160,000
	Inhalers Head	545,000

*These amounts are reported in units, not bottles.

REPORT OF ANALYSIS

SAMPLED BY E.G.

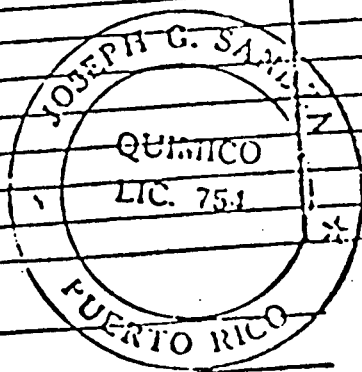
DATE SUBMITTED May 13, 1975

SOURCE VJCK-MERRELL

DESCRIPTION OF SAMPLES

1. Effluent-S T Plant
2. Creek
3.
4.

PARAMETERS	1	2	3	4
pH	8.8	8.1		
Temperature, °C				
Alkalinity, (as CaCO ₃) mg/l	5	14		
B. O. D., mg/l				
C. O. D., mg/l	1,382	2,106		
Solids, Total, mg/l				
Solids, Dissolved, mg/l	43	190		
Solids, Suspended, mg/l				
Solids, Volatile, mg/l				
Ammonia (N) mg/l	20.7	9.4		
Kjeldahl (N) mg/l	0.175	0.60		
Nitrate (N) mg/l	1.90	0.78		
Phosphorous, total (P), mg/l				
Phosphorous, Ortho (P), mg/l				
Sulfate, mg/l				
Sulfite, mg/l				
Phenols, mg/l				
Cyanide, mg/l				
Oil and Grease, mg/l				
Hardness, Total, mg/l	1,032.98	627.26		
Chloride, mg/l	36	84		
Color, Pt-Co Units	28	120		
Turbidity, Jackson Units				
Conductivity, Micromhos	1,510	1.1 x 10 ⁶		
Coliform, Total No./100 ml	10	1.9 x 10 ⁵		
Coliform, Fecal No./100 ml	6.95	5.0		
D.O., mg/l	0	0.05%		
Settleable Solids, vol. %				



REMARKS

DATE REPORTED: May 22, 1975

BY [Signature]

REFERENCE 16

October 8, 1990

Mr. Nelson Hernández (D-033)
Chief, Processing Data Division
Pretreatment Area
Puerto Rico Aqueduct and Sewer Authority
P.O. Box 7066
Bo. Obrero Station
Santurce, Puerto Rico 00916

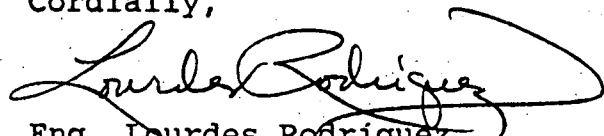
Dear Mr. Hernández:

Enclosed please find the initial report of Laboratory Hazardous Waste spill occurred last Tuesday, October 2, 1990.

Follow up report containing results of analysis on TCLP, TTO, TOC and pH performed at the grease trap and on Wastewater Treatment Plant effluent to PRASA will be submitted as soon as they will be received.

If any question should arise, please advise.

Cordially,



Eng. Lourdes Rodríguez
Project/Environmental Affairs
Engineer

Attachment

/rr

cc: Lizette Lugo - PRASA
Santos Rohena - EQB
Adalberto Bosque - EPA
Gonzalo González - SARA Committee
Jim Chezem - P&G ECD Contact - Cincinatti
Javier Padró - OCI
Joseph Olózaga - OCI
Remy Arce - OCI
Antonio Rosario - OCI

OLAY COMPANY, INC.
A PROCTER & GAMBLE COMPANY

ENVIRONMENTAL INCIDENT REPORT
LABORATORY HAZARDOUS WASTE SPILL
OCTOBER 3, 1990

SUBMITTED BY:

LOURDES RODRIGUEZ
PROJECT ENGINEER

CAYEY, PUERTO RICO

SUMMARY

On Tuesday, October 2, 1990 at 7:30 P.M. a hazardous waste spill occurred on the premises of Olay Company Inc.

Approximately 15 gallons of organic toxic waste (Pyridine, toluene, chloroform, organic solvents) were thrown by Housekeeping personnel in the equalization tank of the Dissolved Air Flotation Unit. The drum containing the wastes was not identified as "hazardous waste" and placed inappropriately along with the greases to be disposed in the DAF.

The incident was detected on Wednesday, October 3, 1990 at 8:00 A.M. by QC Laboratory Manager, but was reported at 2:00 P.M. to Environmental Contact (Engineering Department). Promptly, all remaining water in DAF was collected in the pit around the unit. DAF effluent water was also contained in the pit, thus preventing it to flow to Wastewater Treatment Plant. Composite sampling at WWTP started immediately for TCLP, BOD, COD, TSS, TOC and Ph for two days. Next two days, grab sampling was performed also on DAF for TOC, TTO and Ph. Discharge to PRASA was not discontinued because of small amount of spilled waste compared to WWTP capacity. We are also assuming that, because of low production during these days, most of the spill was contained on DAF, while the rest digested by bacteria on WWTP.

DAF water was collected in a holding truck until results of analysis are ready.

All required State and Local Agencies (EPA, EQB, PRASA, SARA Committee) were notified of the incident within twenty-four (24) hours of awareness.

INCIDENT CAUSE

Laboratory Hazardous Wastes (Pyridine, Toluene, Chloroform, Organic Solvents) are collected in a special DOT approved container placed in a designed area in Quality Control Laboratory.

According to the plant's standard operating procedures, such containers should be labeled everytime with a special "Hazardous Waste" sticker. Once filled, a log sheet of hazardous contents is submitted to Environmental Contact by laboratory technician certified in hazardous waste handling by Plant Environmental Manager.

After a maximum of three(3) days, full container must be placed in a rejected area designed for hazardous and toxic substances outside the plant. (Entrance to this area is strictly controlled).

The night of the incident, a 15 gallon container full of hazardous waste was left unidentified with the special sticker among with other grease wastes, to be disposed on Dissolved Flotation Unit. Due to improper location of the drum and lack of identification, housekeeping employees threw it on the first equalization tank of the DAF.

SEQUENCE OF EVENTS

October 2, 1990

- 19:30 - Housekeeping personnel (M & M Cleaning Services) disposed laboratory hazardous waste improperly on DAF first equalization pit.

October 3, 1990

- 8:00 - Mr. Antonio Rosario (Quality Control Laboratory Manager) found the hazardous waste container emptied. It was located in the same place where it was left the day before.
- 14:00 - Mr. Antonio Rosario notified Eng. Lourdes Rodríguez (Environmental Contact) about what happened with the wastes. He had contacted Mr. Máximo Ayala (M & M Cleaning Services) who told him his employees had thrown the wastes on the DAF.
- 14:10 - Eng. William Carrión, Plant Environmental Manager, is then notified of the incident. Immediately DAF water was completely collected on its pit and composite sampling on Wastewater Treatment Plant effluent to PRASA started. Carbon filter was activated and effluent passed through it.
- 15:50 - Mrs. Monserrate Santiago (Puerto Rico Aqueduct and Sewer Authority) was notified about incident and actions taken.
- 16:10 - Procter and Gamble's Environmental Control Department contact (Al Haberer) was contacted and notified of the environmental incident. His recommendation included not to collect any of WWTP effluent to PRASA due to little quantity of spilled waste in comparison with wastewater plant's capacity and local wastewater treatment plant capacity. Thus, effluent to PRASA was not discontinued.

October 4, 1990

- 9:30 - Sampling on WWTP effluent to PRASA and in grease trap was performed by EQ-LAB Environmental Laboratories.

10:00-

10:40- Following agencies were notified:

<u>Agency</u>	<u>Contact</u>
Environmental Protection Agency	Mrs. Sanabria (for Santos Rohena)
Environmental Protection Agency	Eng. Adalberto Bosque
Civil Defense (SARA Committee)	Mr. Gonzalo González

10:45- Mrs. Monserrate Santiago and Mr. Josías Reyes (PRASA) came to our facilities for an investigation of the incident.

October 5, 1990

9:30- Sampling on WWTP effluent to PRASA and on grease trap was performed by EQ-LAB.

21:20- Collection of grease trap water is finished using a holding truck (Cidra Transport).

ACTION TAKEN

A. Sampling of WWTP effluent to PRASA

<u>DATE</u>	<u>PARAMETER</u>	<u>TYPE OF SAMPLE</u>
10/4/90	TCLP	Grab
	TOC	Composite
	BOD, COD, TSS	Composite
10/5/90	TOC	Composite
	TTO	C/G
	Ph	Grab
	BOD, COD, TSS	

B. Sampling of collected water at DAF.

<u>DATE</u>	<u>PARAMETER</u>	<u>TYPE OF SAMPLE</u>
10/4/90	TOC	Composite
10/5/90	TTO	C/G
	Ph	Grab

Water collected on DAF Unit transferred to a holding truck until laboratory results are ready. Further action will be taken after that happens.

REFERENCE 17

4 de agosto de 1989

Sr. William Carrión
Ingeniero Ambiental
OLAY COMPANY INC.
Apartado 7000
Cayey, Puerto Rico 00639

ASUNTO: OLAY COMPANY INC.
CARR. 735, KM. 2.3
CAYEY, PUERTO RICO
PFE-18-0588-0368-I-II-0

Estimado señor Carrión:

Me refiero a su solicitud para autorización de la fuente de emisión de epígrafe.

Luego de someterse la documentación necesaria y realizarse la evaluación correspondiente, SE AUTORIZA la operación CONDICIONADA de la fuente de emisión de referencia en cuanto a contaminación atmosférica respecta, incluyendo los términos y condiciones sometidas en su solicitud, las cuales forman parte de esta autorización. Esta autorización vencerá el día 4 de agosto de 1991 y podrá ser revocada, antes de esa fecha, de tenerse conocimiento de que han variado las condiciones bajo las cuales se otorga o se violen las disposiciones del Reglamento vigente aplicable.

Durante la vigencia de esta autorización deberá cumplir con lo siguiente:

1- El contenido de azufre máximo en el combustible líquido No. 5 que oxida la caldera de vapor con capacidad de 200 HP no debe exceder de 2.5% por ciento por peso según la Orden y Resolución emitida por esta Junta el 25 de noviembre de 1986.

2- El consumo máximo de combustible No. 5 en la referida caldera no debe exceder de 56 galones por hora según los datos sometidos a esta Junta.

3- Deberá continuar enviando los informes mensuales sobre el consumo de combustible y su contenido de azufre debidamente certificado según la Resolución antes mencionada y la Regla 103 del Reglamento para el Control de la Contaminación Atmosférica, vigente.

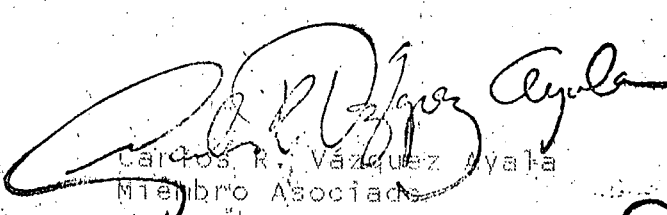
4- De tener interés en el futuro por variar estas condiciones o los equipos de la emisión incorporados en este permiso, deberá solicitarlo por escrito a esta Junta para su evaluación.

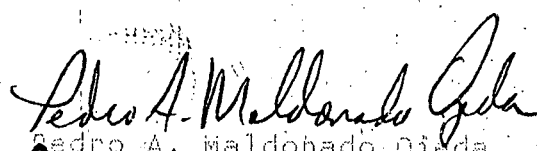
Las fuentes de emisión que se autorizan con este documento se detallan en el Anejo A, que forma parte de esta autorización, incluyendo aquellas sometidas en la solicitud para aprobación.

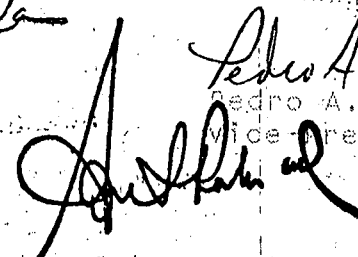
Deseamos indicar que esta Junta se reserva el derecho de intervenir con dicha fuente en otros aspectos ambientales no cubiertos por esta autorización.

Cordialmente,

JUNTA DE CALIDAD AMBIENTAL


Carlos R. Vázquez Ayala
Miembro Asociado


Pedro A. Maldonado Ojeda
Vice-Presidente


Santos Rohena Betancourt
Presidente

AI-IL-misa

4 de agosto de 1989

ANEJO A

FUENTES DE EMISION INCLUIDAS EN ESTA AUTORIZACION

PUENTE	EQUIPO DE CONTROL	CARACTERISTICAS
I. Area de tabletas		
a. Dos romanas ^{OK}	Un lavador de gases #202, con capacidad para 2,400 cfm y con eficiencia estimada en 95%	Se utilizan para pesar materia prima
b. "Fluid Bed Dryer" ^{OK}	Un sistema colector de polvo tipo sacos de 4,237 cfm.	Se utiliza para secado de tabletas
c. Mezcladora de Tyloxapol ^{OK}	-----	Utiliza 120 Kg/sem de Tyloxapol
d. Diez tanques para mezclado ^{OK}	-----	Se utilizan para la mezcla de aguas, aceite mineral y PF Wax. Tiene un respiradero el cual están conectados todos los tanques. Se mezclan 8,500 galones por semana.
II. Area de Cremas		
a. Un Ozonizador ^{OK}	Un tanque con convertidos catalítico	Produce 2 #/dia de ozono.
III. Area de Inhaladores		
a. Unidad productora de inhaladores ^{OK}	Un sistema de ventilación para compuestos orgánicos con capacidad de 300 cfm.	Tiene una emisión estimada en 1.56 gr./min. de compuestos orgánicos.
b. Línea de llenado de vaporub ^{OK}	Un sistema de ventilación de 300 cfm.	Utiliza adhesivos para sellar las cajas.

OLAY COMPANY INC.
PFE-18-0588-0368-I-II-O

IV. Area de Utilidades

a. Dos calderas de 50 HP (c/u), marca Cleaver & Brooks

Consumen 15 gals/hr de Kerosene (c/u)

b. Dos bombas para combatir incendio

Cada bomba tiene un motor de 215 HP, que utilizan Diesel a raz6n de 10gals/hr

c. Unidad generadora de electricidad

Posee un motor de 1490 HP y utiliza Diesel a raz6n de 35 gals./hr.

OLAY COMPANY INC.
PFE-18-0588-0368-I-II-O

ANEJO B

FUENTES DE EMISIONES CUYAS CAPACIDADES DE CALOR SUPLIDO EXCEDEN DE 8 MM BTU/HR

SOURCE NAME	Stack	CAPACITY	Stack coor. (Km)		Allowable	Coordinating Parameters	
	No.		X	Y		Stack Height	Exit Temp (F)
Una (1) caldera de 20 HP Cleaver Brooks	1	8.26 MM BTU/HR	103.41	32.72	2.5	42	500°F

REFERENCE 18

Olay Company, Inc.

February 22, 1990

Environmental Quality Board
P. O. Box 11488
Santurce, Puerto Rico 00910

Attention: Mr. Carlos Vazquez

Dear Mr. Vazquez:

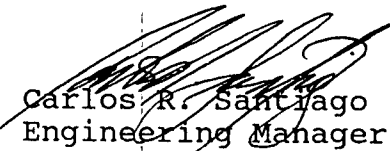
SUBJECT: SARA TIER TWO INVENTORY REPORT (Non-Confidential Pages)

Pursuant to U.S. EPA Regulations 40 CFR 370.25(a), we have completed and attached the U.S. EPA and/or State Tier Two forms. The forms are submitted for all chemicals subject to SARA section 312 which were present at our plant in 1989 in quantities above the minimum reporting thresholds. Confidential pages of the report forms are being sent to you under separate cover.

Although the EPA regulations categorize these chemicals as "hazardous", our inclusion of the chemicals in this response does not mean that as used in our plant, they pose a hazard to our community. While we must, and will comply with the law we want the file to clearly show that the inclusion of any chemical does not in and of itself indicate any degree of risk to our community.

Should any questions arise with respect to the chemicals in our submission, please contact me at 738-2191, extension 2100.

Sincerely,


Carlos R. Santiago
Engineering Manager

ar

Attachment

cc: W. Carrion
J. Olozaga

OFICINA DEL PRESIDENTE

MAR 13 1990

Olay Company, Inc.
Call Box 7000
Cayey, Puerto Rico 00634
Telephone: (809) 738-2191

A Procter & Gamble Company

Trans I

Tier Two
EMERGENCY
AND
HAZARDOUS
CHEMICAL
INVENTORY

Specific
information
by Chemical

Facility Identification

Name Olay Company Inc.
Street Address Road 735, Km 2.3 - Bo. Rincon
City Cayey State PR Zip 00633
SIC Code 2834 Div & Prod Number 017411737
FOR OFFICIAL USE ONLY
ID # _____
Date Received _____

Owner/Operator Name

Name Olay Company Inc. Phone 809, 738-2191
Mail Address Call Box 7000 - Cayey, Puerto Rico
Emergency Contact
Name Security Title Security Guard
Phone (809) 738-2191 24 Hr. Phone (809) 738-2191
Name William Carrion Title Plant Engineer
Phone (809) 738-7173 24 Hr. Phone (809) 738-2191

Important: Read all instructions before completing form

Reporting Period From January 1 to December 31, 19 89

Chemical Description

Physical and Health Hazards

(check all that apply)

Inventory
Max. Daily Amount (code) Avg. Daily Amount (code) No. of Days On-site (days)

Storage Codes and Locations (Non-Confidential)

Storage Code Storage Locations

CAS 8008206 Trade Secret ☐
Chem. Name KEROSENE
Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas

☒ Fire
☐ Sudden Release of Pressure
☐ Reactivity
☐ Immediate (acute)
☐ Delayed (chronic)

03 02 365

CONFIDENTIAL

CAS Trade Secret ☐
Chem. Name DIESEL FUEL #2
Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas

☒ Fire
☐ Sudden Release of Pressure
☐ Reactivity
☐ Immediate (acute)
☐ Delayed (chronic)

03 02 365

CONFIDENTIAL

CAS Trade Secret ☐
Chem. Name FUEL OIL #5
Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas

☒ Fire
☐ Sudden Release of Pressure
☐ Reactivity
☐ Immediate (acute)
☐ Delayed (chronic)

04 04 365

CONFIDENTIAL

Certification (Read and sign after completing all sections)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

CARLOS R. SANTIAGO - ENGINEERING MANAGER

Name and official title of owner/operator, OUI owner/operator's authorized representative

Signature

Date signed

Optional Attachments (Check one)

☒ I have attached a site plan
☐ I have attached a list of site coordinate abbreviations

Hier Two
EMERGENCY
AND
HAZARDOUS
MATERIAL
INVENTORY
specific
information
on Chemical

Facility Identification

Name Olay Company Inc.
Street Address Road 735, Km 2.3 - Bo. Rincon
City Cayey State PR Zip 00633
SIC Code 2834 Date & Brand Number 0174111737
FOR OFFICIAL USE ONLY ID #
Date Received

Owner/Operator Name

Name Olay Company Inc. Phone (809) 738-2191
Mall Address Call Box 7000 - Cayey, Puerto Rico

Emergency Contact

Name Security Title Security Guard
Phone (809) 738-2191 24 Hr. Phone (809) 738-2191
Name William Carrion Title Plant Engineer
Phone (809) 738-7173 24 Hr. Phone (809) 738-2191

Important: Read all instructions before completing form

Reporting Period From January 1 to December 31, 19 89

Chemical Description	Physical and Health Hazards (check all that apply)	Inventory			Storage Codes and Locations (Non-Confidential)	
		Max. Daily Amount (code)	Avg. Daily Amount (code)	No. of Days On-site (days)	Storage Code	Storage Locations
CAS# <u>7664939</u> Trade Secret <input type="checkbox"/> Chem. Name <u>SULFURIC ACID</u> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas	Fire <input type="checkbox"/> Explosion Release of Pressure <input type="checkbox"/> Reactivity <input type="checkbox"/> X Immediate (acute) X Delayed (chronic)	<u>02</u>	<u>02</u>	<u>365</u>	<u>CONFIDENTIAL</u>	
CAS# <u></u> Trade Secret <input type="checkbox"/> Chem. Name <u>TURPENTINE</u> Check all that apply: <input checked="" type="checkbox"/> Pure <input type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas	Fire <input type="checkbox"/> Explosion Release of Pressure <input type="checkbox"/> Reactivity <input type="checkbox"/> X Immediate (acute) Delayed (chronic) <input type="checkbox"/>	<u>03</u>	<u>03</u>	<u>365</u>	<u>CONFIDENTIAL</u>	
CAS# <u></u> Trade Secret <input type="checkbox"/> Chem. Name <u></u> Check all that apply: <input type="checkbox"/> Pure <input type="checkbox"/> Mix <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas	Fire <input type="checkbox"/> Explosion Release of Pressure <input type="checkbox"/> Reactivity <input type="checkbox"/> Immediate (acute) <input type="checkbox"/> Delayed (chronic) <input type="checkbox"/>	<u></u>	<u></u>	<u></u>		

certification (Read and sign after completing all sections)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my belief of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

CARLOS R. SANTIAGO - ENGINEERING MANAGER

Print name and official title of person from the OHA responsible for the certification and sign

Signature

Date signed 2/22/90

Optional Attachments (Check one)

☒ I have attached a site plan
☐ I have attached a list of site coordinate abbreviations

- ONLY ORIGINATOR MAY AUTHORIZE COPY
MAY BE STRICTLY CONTROLLED



LEWIS & CLARK, INC.

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if

SITE PLAN OF CHEMICAL LOCATION

Olay Company, Inc.

CALL BOX 7070, LAYFAY, PUERTO RICO 05634

Olay Company, Inc.

February 22, 1990

Environmental Quality Board
P.O. Box 11488
Santurce, Puerto Rico 00910

Attention: Mr. Carlos Vazquez

Dear Mr. Vazquez:

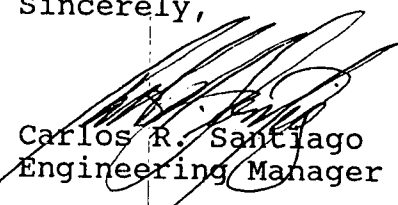
SUBJECT: SARA TIER TWO INVENTORY REPORT (Confidential Pages)

Pursuant to U.S. EPA Regulations 40 CFR 370.25(a), we have completed and attached the "confidential" U.S. EPA, Tier Two inventory forms. These forms include each chemical which is subject to SARA Section 312 and which was present in our plant in 1989 in quantities above the minimum reporting threshold. Copies of the "Non-Confidential" pages of the Inventory Report are being sent to you under separate cover.

Per the U.S. EPA Tier Two Instructions FRP38377, "Under Title III Section 324, you may elect to withhold location information on a specific chemical from disclosure to the public". We hereby request that the attached pages be given such confidential status.

Should any questions arise with respect to the chemicals in our submission, please contact me at 738-2191, extension 2100.

Sincerely,



Carlos R. Santiago
Engineering Manager

ar

Attachment

cc: W. Carrion
J. Olozaga

Olay Company, Inc.
Call Box 7000
Cayey, Puerto Rico 00634
Telephone: (809) 738-2191

A Procter & Gamble Company

Tier Two
EMERGENCY
AND
HAZARDOUS
CHEMICAL
INVENTORY

Specific
Information
by Chemical

Facility Identification

Name OLAY COMPANY INC.
Street Address Road 735, Km 2.3 - Bo. Rincón
City Cayey State P.R. Zip 00633

SIC Code 2834 Dun & Brad Number 01-741-1737

FOR
OFFICIAL
USE
ONLY

ID #

Date Received

Owner/Operator Name

Name OLAY COMPANY INC. Phone (809) 738-2191
Mail Address Call Box 7000, Cayey, Puerto Rico 00634

Emergency Contact

Name Security Title Security Guard
Phone (809) 738-2191 24 Hr. Phone (809) 738-2191

Name William Carrion Title Plant Engineer
Phone (809) 738-7173 24 Hr. Phone (809) 738-2191

Important: Read all instructions before completing form

Reporting Period From January 1 to December 31, 19 89

Confidential Location Information Sheet

Storage Codes and Locations (Confidential)

Storage Codes

Storage Locations

CAS # 80008 206 Chem. Name KEROSENE

A	1	4

Storage Tank Outside Bldg. B
(see Site Plan)

CAS # Chem. Name DIESEL FUEL #2

A	1	4

Storage Tanks Outside Bldg. A
(see Site Plan)

CAS # Chem. Name FUEL OIL #5

A	1	4

Storage Tanks Outside Bldg. A
(see Site Plan)

Certification (Read and sign after completing all sections)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

CARLOS R. SANTIAGO - ENGINEERING MANAGER

Name and official title of owner/operator OR owner/operator's authorized representative

Signature

Date signed 2/22/89

Optional Attachments (Check one)



I have attached a site plan

☐ I have attached a list of site coordinate abbreviations

Tier Two EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY <i>Specific</i> <i>Information</i> <i>by Chemical</i>	Facility Identification Name <u>OLAY COMPANY INC.</u> Street Address <u>Road 735, Km 2.3, Bo. Rincon</u> City <u>Cayey</u> State <u>P.R.</u> Zip <u>00633</u> SIC Code <u>2834</u> Dun & Brad Number <u>01-741-1737</u>		Owner/Operator Name Name <u>OLAY COMPANY INC.</u> Phone <u>(809) 738-2191</u> Mail Address <u>Call Box 7000, Cayey, Puerto Rico 00634</u>	
	Emergency Contact Name <u>Security</u> Title <u>Security Guard</u> Phone <u>(809) 738-2191</u> 24 Hr. Phone <u>(809) 738-2191</u>		Name <u>William Carrion</u> Title <u>Plant Engineer</u> Phone <u>(809) 738-7173</u> 24 Hr. Phone <u>(809) 738-2191</u>	
	FOR OFFICIAL USE ONLY ID # _____ Date Received _____			

Important: Read all instructions before completing form

Reporting Period From January 1 to December 31, 19 89

Confidential Location Information Sheet

Storage Codes and Locations (Confidential)

Storage Codes

Storage Locations

CAS # 7664939

Chem. Name

SULFURIC ACID

M	1	A

Chemistry Lab - Bldg. B
Fork Lift Batteries
Warehouse Bldg. A & Bldg. C

(see Site Plan)

CAS #

Chem. Name

TURPENTINE

A	1	4

Storage Tank - Outside Bldg. A
(see Site Plan)

CAS #

Chem. Name

Certification (Read and sign after completing all sections)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

CARLOS R. SANTIAGO - ENGINEERING MANAGER

Name and official title of owner/operator (or owner/operator's authorized representative)

Signature

Date signed

Optional Attachments (Check one)

☒ ☐

I have attached a site plan
I have attached a list of site coordinate abbreviations

- ONLY ORIGINATOR MAY AUTHORIZE COPY
- MUST BE STRICTLY CONTROLLED



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Olay Company Inc.

CALL BOX 1075 (AFTER POSTAL HOUR)

REFERENCE 19

TELEPHONE (809) 738-2191
TELEX 385-5504

VICKS INC.
Box V - Cayey, Puerto Rico 00633

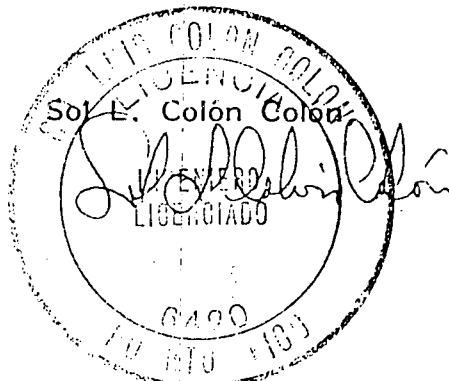
CABLE ADDRESS:
MERVI

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
FOR VICKS, INC.
CAYEY, PUERTO RICO

The attached Spill Prevention Control and Countermeasure Plan has been approved by Vicks, Inc. to prevent oil pollution at its Cayey plant.


Emilio Escobar
Engineer Manager

I certify that I am familiar with the facility and with the provisions of Part 112, subchapter D, Chapter I of Title 40, Code of Federal Regulations and that the attached Spill Prevention Control and Countermeasures Plan has been prepared in accordance with good engineering practices.



SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
FOR VICKS, INC.
CAYEY, PUERTO RICO

The Spill Prevention Control and Countermeasure plan that is set forth here is to meet the requirements of the Federal Water Pollution Control Act, Section 311(j)(1)(c). The Regulation is Part 112 of subchapter D, Chapter I of Title 40, Code of Federal Regulation (FR 38, No. 237-34164).

The plan is designed to prevent discharge of oil to navigable waters, as defined in Section 502(7) of the FWPCA (Public Law 92-500), and tributaries of such waters. This plan is to be reviewed every three years and improved, if necessary.

The Vicks, Inc. facilities at Cayey have not experienced any oil spill events. The Engineering Manager is accountable for oil spill prevention. He reports to the Director of Operations.

GENERAL INFORMATION

The Vicks, Inc. plant is well laid out to prevent oil discharge, which could contaminate the water of Puerto Rico and to contain such spills should they occur. The plant is bordered by a storm sewer that can discharge at only one point.

Oil is handled, or stored, in the following plant areas:

Vicks, Inc. Kerozene Tanks

Kerozene is stored in two diked horizontal tanks (12,000 gallons each) in the northwest section of the property. The kerozene is supplied by contractors by tank-truck. Each kerozene delivery is handled manually. The dike is drained by a manually opened valve. Dike containing volume is 16,100 gallons.

Merreil Kerozene Tank

Kerozene is stored in a diked horizontal tank (5,000 gallons) in the north-east section of the property. The above explanation for delivery and dike drainage applies. Dike containing volume is 5,057 gallons.

Vicks, Inc. Diesel Tank

Diesel oil is stored in a diked horizontal tank (2,000 gallons) in the north section of the property. The above explanation for delivery and dike drainage applies. Dike containing volume is 2,100 gallons.

SPILL PREVENTION AND CONTAINMENT PROCEDURES

The first effort is directed towards prevention of oil spills and leaks by conscientious attention by all personnel in handling oil and in stopping small leaks. The second effort is to prevent oil from leaving the property.

I. Precautions during unloading of oil

The following precautions should be taken when oil is being transferred:

- a. All valves and transfer pumps should be routinely checked for leakage.
- b. The Security Department must verify that the tankder does not leak each time a load is received. Also that all valves on the tank vehicles are in good working conditions without leaks.
- c. The following operating procedure applies to all operating and maintenance personnel.

"If you observe oil leakage, oil spills, or oil in the storm sewer, take immediate action to stop the oil leak by having the necessary valves shut. Then, notify, the Security Department at once".

The Security Department will notify the Engineering Manager which is responsible for environmental matters, he will inspect the situation and make necessary recommendations.

If an oil spill occurs, the Engineering Manager will notify the U. S. Coast Guard (725-5761) and the Environmental Quality Board (725-5140).

SECURITY

Vicks, Inc. property is surrounded by cyclone fence with locked gates, and television cameras. The main entrance is guarded around the clock. A regular patrol of the property is made by one of the guards.

The guards shall report any oil leaks or oil observed on the ground or in the storm sewer to its supervisor. The guard will record this notification and the time in his log book.

The bottom drain valves on all oil storage tanks will be blank-flanged or capped when not being used to fill or drain the tank.

The drainage valve in the tank dikes is to be locked in the closed position.

PERSONNEL TRAINING

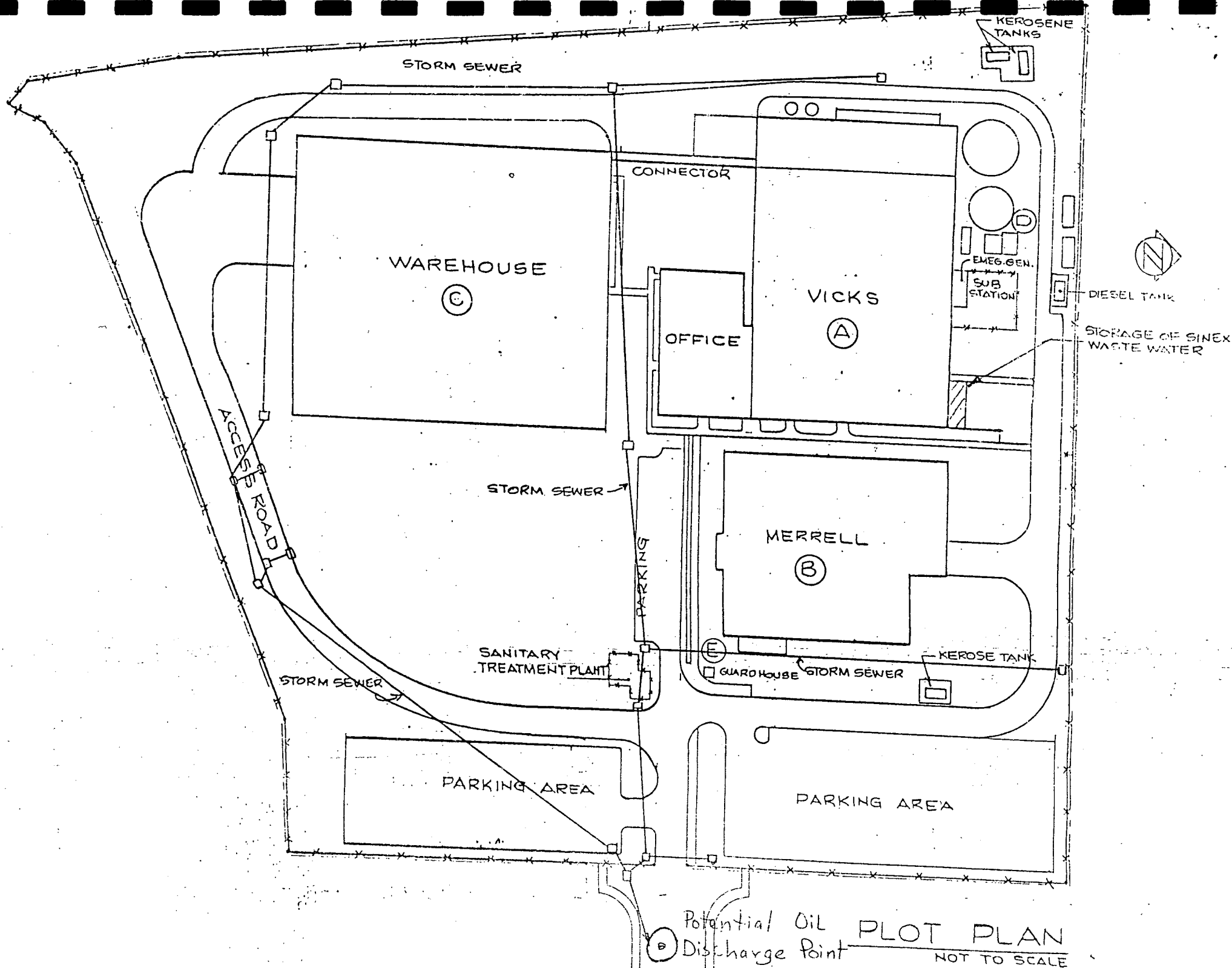
The Maintenance and Security Departments will include discussions of the SPCC plan in the training programs for personnel in their departments. Such discussions will include also past experience, equipment performance and changes to the SPCC plan. Assistance to the training sessions will be taken and filed together with the SPCC plan.

INSPECTION AND RECORDS

The Engineering Manager will prepare a report of each oil leakage incident which does, or might have, become an oil spill event for inclusion with SPCC plan. These reports will be retained for three years.

Records of oil storage tank testing will be retained with the SPCC plan for three years.

The SPCC plan and associated records will be filed in the Engineering Department at the Cayey plant.



PLOT PLAN
NOT TO SCALE

REFERENCE 20



3 de octubre de 1989

M E M O R A N D O

A : Flor del Valle López
Directora
Area Control Contaminación
de Terrenos

DE : Maribel Medina Torres
Especialista en Ciencias
Ambientales Principiante

ASUNTO : Inspección Olay, Co.
Cayey, Puerto Rico

El pasado 3 de octubre de 1989, se visitó la facilidad mencionada en epígrafe, para determinar si cumple con los requisitos aplicables a pequeños generadores de desperdicios peligrosos. En la misma fui recibida por el Ing. William Carrión, Gerente Ambiental de la facilidad. El ingeniero Carrión me mostró el área donde se almacenan los desperdicios peligrosos y proveyó la información ofrecida a continuación.

La compañía se dedica a la elaboración de cosméticos, productos para el cuidado del cabello y productos para el cuidado de la salud. En el proceso se generan residuos de solventes y tinta. De los solventes se generan 15 galones cada tres (3) meses y de la tinta 15 galones anualmente.

En la facilidad se mantiene récords de: análisis de los desperdicios, evidencia de acuerdos con autoridades locales, generación de desperdicios y manifiestos. El resumen de los manifiestos más recientes se presenta a continuación:

<u>Fecha de</u> <u>Transportación</u>	<u>Desperdicio</u> <u>Transportado</u>	<u>Cantidad</u> <u>Transportada</u>
9-8-89	D001, F003, F005, D008	30 gal.

	D001, F002, F003, F005	220 gal.
	D001, F002, F003, F005	30 gal.
6-30-89	D001, F002, F003, F005	55 gal.
	D001, F002, F003	165 gal.
	Non RCRA Regulated	330 gal.
	D008, F005, F003, D001	15 gal.
3-28-89	D001	55 gal.
3-15-89	Non RCRA Regulated	975 lbs.

La facilidad tiene un área satélite en el laboratorio. En ésta había un (1) dron de 15 galones, a medio llenar, que contenía solventes orgánicos. El recipiente se encontraba identificado como desperdicio peligroso.

El área designada para almacenar los desperdicios peligrosos cuenta con: base impermeable, dique, material para el control de derrames, "sprinklers", acceso controlado, extintor de incendios y alarma contra incendios. Sin embargo, no se mantiene récord de inspección del área. Al momento de la inspección no habían desperdicios acumulados en el área.

La facilidad cuenta con un coordinador de emergencias. Además, el personal expuesto, recibe adiestramiento sobre protección personal y manejo de los desperdicios peligrosos.

Los hallazgos de la inspección indican que la facilidad cumple con casi todos los requisitos aplicables a pequeños generadores. No obstante, está exenta de esos requisitos ya que genera menos de 100 kg/mes de estos desperdicios.

Acción Recomendada:

Enviar carta a la facilidad notificando los resultados de la inspección.

|chd



13 de diciembre de 1989

Ing. William Carrión
Environmental Manager
Olay Company
Box V
Cayey, Puerto Rico 633

Estimado ingeniero Carrión:

El pasado 3 de octubre de 1989, personal adscrito al Programa de Pequeños Generadores de Desperdicios Peligrosos, visitó las facilidades de Olay Company en Cayey, para determinar si cumple con los requisitos de este Programa. Durante la inspección realizada se encontró que la facilidad genera menos de 100 kg/mes de desperdicios peligrosos. Por tal razón, está exenta de estos requisitos.

Como generador condicionalmente exento, no podrá exceder el límite de generación señalado, ni acumular más de 1,000 kg de desperdicios peligrosos en su facilidad. De lo contrario, deberá cumplir con todos los requisitos aplicables a pequeños generadores.

Cordialmente,

Flor del Valle López
Directora
Area Control Contaminación
de Terrenos

MM/chd

REFERENCE 21



COMMONWEALTH OF PUERTO RICO / OFFICE OF THE GOVERNOR

Environmental
Quality Board

March 6, 1986

MEMORANDUM

TO : *Yazmin Lopez (per D.L.)*
Eng. Dulcilio Medina
Acting Director
Hazardous Waste Division

THROUGH : Ivette De Jesús Dávila
Chief
Inspection, Monitoring and
Surveillance Section

FROM : *MB*
Priscilla M. Bestard
Environmental Inspector

SUBJECT : Full RCRA - Generator Inspection
Olay Co. - PRD 090450255

A Full RCRA - Generator Inspection was performed to the Olay Co., located in Cayey, Puerto Rico. The facility was visited on January 27, 1986.

Enclosed you will find the following documents:

- Inspection Report
- Notification to the industry

SUMMARY OF FINDINGS

On January 27, 1986, Olay, Co., PRD090450255, located on road 375, Km. 23 Rincón Ward, Cayey, Puerto Rico, was visited. The telephone number is (809) 738-2191.

The purpose of the visit was to perform a Full RCRA - Generator Inspection, according to the State Regulation, Regulation for the Control of Hazardous and Non - Hazardous Solid Wastes, amended version.

During the inspection, Mr. José Cortés, Engineering Manager of the company, met with technical personnel of the Inspection, Monitoring and Surveillance Section and the following information was gathered:

Merrell - National Laboratories, Inc. formerly called Vicks-Merrell, Inc. was established on the actual facilities of Richardson Vicks, Inc.. Merrell ceased operations in Puerto Rico on 1983 and the facility was sold to Olay Co., a subsidiary of Richardson Vicks, Inc.. By this reason Merrell requested to EQB and EPA to cancel its EPA ID Number PRD090450255. EPA answered to Merrell changing their records to show that the facility name and owner for EPA ID Number 090450255 was Olay Co., of Richardson - Vicks, Inc.. This change was notified by the company to EQB on May 23, 1984.

As told by Mr. Cortés, Olay Co., is a subsidiary of Richardson Vicks and do not generate hazardous wastes. He also indicate that Vicks, Inc., Olay Co., Vicks Vaporub and Rho-Mu Corp. are subsidiary companies operated by Richardson-Vicks, Inc..

R-Vicks, Inc. also has an EPA ID Number (PRD090461930) and notified as a generator of hazardous wastes, because one of the manufacturing products trade-name Sinex, is a descongellant that contains thimerosal as a preservative. The thimerosal is a mercury sallicylate, crystalline organic mercurial acid used as antiseptic and germicide. A carbon bed system is used to absorb the mercury from the wash waters. The washwaters are transferred to Vicks waste water treatment plant, then discharged to the sewer system. The charcoal cartridges are changed every year and sent to Servicios Carbareón for disposal.

On December 11, 1984, a reclassification of Generator to Small Quantity Generator was granted by EQB to Vicks, Inc., in response to the petition made by the company.

A visual inspection was made and it was found that Vicks, Inc. does not have a storage area designed for hazardous wastes because no hazardous wastes are generated by the operations except the charcoal cartridges that may contain traces of mercury salts.

Summary of Findings
page 2

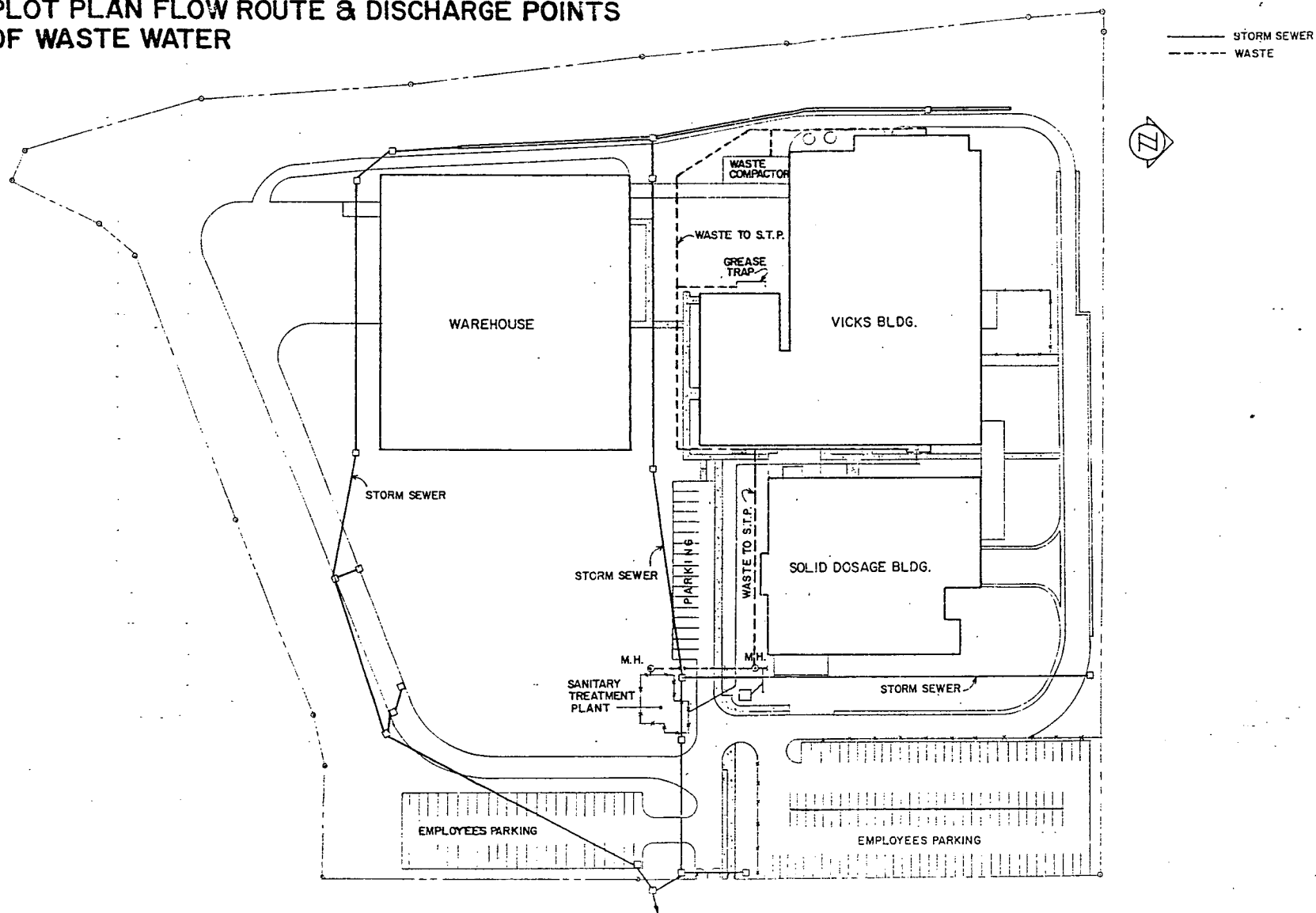
Chemical analysis of this waste (activated carbon) show that the concentrations of mercury in the waste is below the acceptable limits.

CONCLUSIONS AND RECOMMENDATIONS

At the time of the inspection, Olay Co., was found to be operating as a subsidiary of Richardson-Vicks, Inc. and does not generate hazardous wastes.

It is recommended to send a notification to the company requesting information (certified documents) to clarify the change of the ID Number from Merrell to Olay. Also a certification that Olay Co. does not generate hazardous wastes must be requested.

PLOT PLAN FLOW ROUTE & DISCHARGE POINTS OF WASTE WATER



DRW. BY: C. PEREZ
SCALE: 1" = 100'-0"

REFERENCE 22

Olay Company Inc.

CALL BOX 7000, CAYEY, PUERTO RICO 00634

Telephone (809) 738-2191
Telex: 345-0254
Cable Address: MERV I

June 26, 1989

U. S. Environmental Protection Agency
P. O. Box 70266
Washington, D.C. 20024-0266

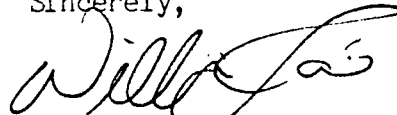
Attn: Toxic Chemical Release Inventory

Gentlemen:

Attached please find the Toxic Chemical Release Inventory Reporting Form for 1988.

If you have any questions or need additional information please do not hesitate to call us.

Sincerely,



William Carrion
Facilities Engineer

ar

Attachment

cc: Environmental Quality Board
Santurce, Puerto Rico

(Important: Type or print; read instructions before completing form.)



U.S. Environmental Protection Agency

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

Public reporting burden for this collection of information is estimated to vary from 30 to 34 hours per response, with an average of 32 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch (PM-223), US EPA, 401 M St., SW, Washington, D.C. 20460 Attn: TRI Burden and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Paperwork Reduction Project (2070-0093), Washington, D.C. 20503.

**EPA FORM
R****PART I.
FACILITY
IDENTIFICATION
INFORMATION**

(This space for your optional use.)

1.1 Are you claiming the chemical identity on page 3 trade secret? <input type="checkbox"/> Yes (Answer question 1.2; Attach substantiation forms.) <input checked="" type="checkbox"/> No (Do not answer 1.2; Go to question 1.3.)	1.2 If "Yes" in 1.1, is this copy: <input type="checkbox"/> Sanitized <input type="checkbox"/> Unsanitized	1.3 Reporting Year 19 <u>88</u>
--	---	------------------------------------

2. CERTIFICATION (Read and sign after completing all sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official

CARLOS R. SANTIAGO - ENGINEERING MANAGER

Signature

Date signed

6/26/89

3. FACILITY IDENTIFICATION

3.1	Facility or Establishment Name OLAY COMPANY, INC.	
	Street Address ROAD 735, Km. 2.3	
	City CAYEY	County
	State PUERTO RICO	Zip Code 00633

WHERE TO SEND COMPLETED FORMS:

1. U.S. ENVIRONMENTAL PROTECTION AGENCY
P.O. BOX 70266
WASHINGTON, DC 20024-0266
ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See instructions Appendix E)

3.2	This report contains information for (Check one): a. <input checked="" type="checkbox"/> An entire facility b. <input type="checkbox"/> Part of a facility.					
3.3	Technical Contact WILLIAM CARRION-HERNANDEZ				Telephone Number (include area code) (809) 738-2191	
3.4	Public Contact LESBIA B. DIAZ				Telephone Number (include area code) (809) 738-2191	
3.5	SIC Code (4 digit) a. 2834	b.	c.	d.	e.	f.
3.6	Latitude Degrees Minutes Seconds 66 08 25			Longitude Degrees Minutes Seconds 18 07 38		
3.7	Dun & Bradstreet Number(s) a. 01-741-1737				b. N/A	
3.8	EPA Identification Number(s) (RCRA I.D. No.) a. PRD090461930				b. N/A	
3.9	NPDES Permit Number(s) a. N/A				b. N/A	
3.10	Receiving Streams or Water Bodies (enter one name per box) a. N/A				b.	
	c. N/A				d.	
	e. N/A				f.	
3.11	Underground Injection Well Code (UIC) Identification Number(s) a. N/A				b.	

4. PARENT COMPANY INFORMATION

4.1	Name of Parent Company PROCTER & GAMBLE COMPANY
4.2	Parent Company's Dun & Bradstreet Number 00-131-6827

**EPA FORM R**
PART II. OFF-SITE LOCATIONS TO WHICH TOXIC
CHEMICALS ARE TRANSFERRED IN WASTES

(This space for your optional use.)

1. PUBLICLY OWNED TREATMENT WORKS (POTWs)

1.1 POTW name "EL TORITO" WWTP		1.2 POTW name	
Street Address EL TORITO		Street Address	
City CAYEY	County N/A	City	County
State PUERTO RICO	Zip 00634	State	Zip

2. OTHER OFF-SITE LOCATIONS (DO NOT REPORT LOCATIONS TO WHICH WASTES ARE SENT ONLY FOR RECYCLING OR REUSE).

2.1 Off-site location name N/A		2.2 Off-site location name	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? [] Yes [] No		Is location under control of reporting facility or parent company? [] Yes [] No	

2.3 Off-site location name N/A		2.4 Off-site location name	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? [] Yes [] No		Is location under control of reporting facility or parent company? [] Yes [] No	

2.5 Off-site location name N/A		2.6 Off-site location name	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? [] Yes [] No		Is location under control of reporting facility or parent company? [] Yes [] No	

[] Check if additional pages of Part II are attached. How many? _____

EPA FORM R
PART III. CHEMICAL-SPECIFIC INFORMATION

(This space for your optional use.)

1. CHEMICAL IDENTITY (Do not complete this section if you complete Section 2.)

- 1.1 [Reserved]
- 1.2 CAS Number (Enter the number exactly as it appears on the 313 list. Enter NA if reporting a chemical category.)
007647-01-0
- 1.3 Chemical or Chemical Category Name (Enter the name exactly as it appears on the 313 list.)
HYDRO CHLORIC ACID
- 1.4 Generic Chemical Name (Complete only if Part I, Section 1.1 is checked "Yes." Generic name must be structurally descriptive.)

2. MIXTURE COMPONENT IDENTITY (Do not complete this section if you complete Section 1.)

2. Generic Chemical Name Provided by Supplier (Limit the name to a maximum of 70 characters (e.g., numbers, letters, spaces, punctuation).)

3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Check all that apply.)

- 3.1 Manufacture the chemical:
- | | | |
|-------------------------------------|--|---|
| a. <input type="checkbox"/> Produce | c. <input type="checkbox"/> For on-site use/processing | d. <input type="checkbox"/> For sale/distribution |
| b. <input type="checkbox"/> Import | e. <input type="checkbox"/> As a byproduct | f. <input type="checkbox"/> As an impurity |
- 3.2 Process the chemical:
- | | | |
|--|--|---|
| a. <input type="checkbox"/> As a reactant | b. <input type="checkbox"/> As a formulation component | c. <input type="checkbox"/> As an article component |
| d. <input type="checkbox"/> Repackaging only | | |
- 3.3 Otherwise use the chemical:
- | | | |
|--|--|---|
| a. <input type="checkbox"/> As a chemical processing aid | b. <input type="checkbox"/> As a manufacturing aid | c. <input checked="" type="checkbox"/> Ancillary or other use |
|--|--|---|

4. MAXIMUM AMOUNT OF THE CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

03 (enter code)

5. RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE

You may report releases of less than 1,000 lbs. by checking ranges under A.1. (Do not use both A.1 and A.2)		A. Total Release (lbs/yr)		B. Basis of Estimate (enter code)	
		A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
5.1 Fugitive or non-point air emissions	5.1a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	0	5.1b <input type="checkbox"/>		
5.2 Stack or point air emissions	5.2a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	64	5.2b <input type="checkbox"/>		
5.3 Discharges to receiving streams or water bodies 5.3.1 <input type="checkbox"/> (Enter letter code from Part I Section 3.10 for stream(s) in the box provided.) 5.3.2 <input type="checkbox"/> 5.3.3 <input type="checkbox"/>	5.3.1a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.3.1b <input type="checkbox"/>	C. % From Stormwater	
	5.3.2a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.3.2b <input type="checkbox"/>	5.3.1c N/A	
	5.3.3a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.3.3b <input type="checkbox"/>	5.3.2c	
5.4 Underground Injection	5.4a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.4b <input type="checkbox"/>	5.3.3c	
5.5 Releases to land					
5.5.1 On-site landfill	5.5.1a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.5.1b <input type="checkbox"/>		
5.5.2 Land treatment/application farming	5.5.2a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.5.2b <input type="checkbox"/>		
5.5.3 Surface impoundment	5.5.3a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.5.3b <input type="checkbox"/>		
5.5.4 Other disposal	5.5.4a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.5.4b <input type="checkbox"/>		

[] (Check if additional information is provided on Part IV—Supplemental Information.)



EPA FORM R
PART III. CHEMICAL-SPECIFIC INFORMATION
 (continued)

(This space for your optional use.)

6. TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS

You may report transfers of less than 1,000 lbs. by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (lbs/yr)		B. Basis of Estimate (enter code)	C. Type of Treatment/Disposal (enter code)
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
6.1.1 Discharge to POTW (enter location number from Part II, Section 1.)	<input type="checkbox"/> 1 <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	0	6.1.1b <input type="checkbox"/> 0
6.2.1 Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2 <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	6.2.1b <input type="checkbox"/> 6.2.1c <input type="checkbox"/> M <input type="checkbox"/>
6.2.2 Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2 <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6.2.2b <input type="checkbox"/> 6.2.2c <input type="checkbox"/> M <input type="checkbox"/>
6.2.3 Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2 <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6.2.3b <input type="checkbox"/> 6.2.3c <input type="checkbox"/> M <input type="checkbox"/>

☐ (Check if additional information is provided on Part IV-Supplemental Information.)

7. WASTE TREATMENT METHODS AND EFFICIENCY

A. General Wastestream (enter code)	B. Treatment Method (enter code)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes No
7.1a <input type="checkbox"/> W	7.1b <input type="checkbox"/> C <input type="checkbox"/> 1 <input type="checkbox"/> 1	7.1c <input type="checkbox"/> 3	7.1d <input type="checkbox"/> <input type="checkbox"/>	7.1e 100%	7.1f <input type="checkbox"/> <input type="checkbox"/> [X]
7.2a <input type="checkbox"/>	7.2b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.2c <input type="checkbox"/>	7.2d <input type="checkbox"/> <input type="checkbox"/>	7.2e %	7.2f <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
7.3a <input type="checkbox"/>	7.3b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.3c <input type="checkbox"/>	7.3d <input type="checkbox"/> <input type="checkbox"/>	7.3e %	7.3f <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
7.4a <input type="checkbox"/>	7.4b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.4c <input type="checkbox"/>	7.4d <input type="checkbox"/> <input type="checkbox"/>	7.4e %	7.4f <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
7.5a <input type="checkbox"/>	7.5b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.5c <input type="checkbox"/>	7.5d <input type="checkbox"/> <input type="checkbox"/>	7.5e %	7.5f <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
7.6a <input type="checkbox"/>	7.6b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.6c <input type="checkbox"/>	7.6d <input type="checkbox"/> <input type="checkbox"/>	7.6e %	7.6f <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
7.7a <input type="checkbox"/>	7.7b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.7c <input type="checkbox"/>	7.7d <input type="checkbox"/> <input type="checkbox"/>	7.7e %	7.7f <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
7.8a <input type="checkbox"/>	7.8b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.8c <input type="checkbox"/>	7.8d <input type="checkbox"/> <input type="checkbox"/>	7.8e %	7.8f <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
7.9a <input type="checkbox"/>	7.9b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.9c <input type="checkbox"/>	7.9d <input type="checkbox"/> <input type="checkbox"/>	7.9e %	7.9f <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
7.10a <input type="checkbox"/>	7.10b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.10c <input type="checkbox"/>	7.10d <input type="checkbox"/> <input type="checkbox"/>	7.10e %	7.10f <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

☐ (Check if additional information is provided on Part IV-Supplemental Information.)

8. OPTIONAL INFORMATION ON WASTE MINIMIZATION

(Indicate actions taken to reduce the amount of the chemical being released from the facility. See the instructions for coded items and an explanation of what information to include.)

A. Type of Modification (enter code)	B. Quantity of the Chemical in Wastes Prior to Treatment or Disposal		C. Index	D. Reason for Action (enter code)
<input type="checkbox"/> M <input type="checkbox"/>	Current reporting year (lbs/yr)	Prior year (lbs/yr)	Or percent change	
	_____	_____	_____ %	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
				<input type="checkbox"/> R <input type="checkbox"/>



EPA FORM R

PART IV. SUPPLEMENTAL INFORMATION

Use this section if you need additional space for answers to questions in Part III.
Number the lines used sequentially from lines in prior sections (e.g., 5.3.4, 6.1.2, 7.11)

(This space for your optional use.)

ADDITIONAL INFORMATION ON RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE
(Part III, Section 5.3)

You may report releases of less than 1,000 lbs. by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Release (lbs/yr)		B. Basis of Estimate (enter code in box provided)	C. % From Stormwater
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
5.3 Discharges to receiving streams or water bodies 5.3. <input type="checkbox"/>	5.3. <input type="checkbox"/> a [] [] []		5.3. <input type="checkbox"/> b	5.3. <input type="checkbox"/> c
(Enter letter code from Part I Section 3.10 for stream(s) in the box provided.) 5.3. <input type="checkbox"/>	5.3. <input type="checkbox"/> a [] [] []		5.3. <input type="checkbox"/> b	5.3. <input type="checkbox"/> c
5.3. <input type="checkbox"/>	5.3. <input type="checkbox"/> a [] [] []		5.3. <input type="checkbox"/> b	5.3. <input type="checkbox"/> c

ADDITIONAL INFORMATION ON TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS
(Part III, Section 6)

You may report transfers of less than 1,000 lbs. by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (lbs/yr)		B. Basis of Estimate (enter code in box provided)	C. Type of Treatment/ Disposal (enter code in box provided)
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
6.1. Discharge to POTW (enter location number from Part II, Section 1.) <input type="checkbox"/> 1 <input type="checkbox"/>	[] [] []		6.1. <input type="checkbox"/> b	
6.2. Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 <input type="checkbox"/>	[] [] []		6.2. <input type="checkbox"/> b	6.2. <input type="checkbox"/> c M <input type="checkbox"/>
6.2. Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 <input type="checkbox"/>	[] [] []		6.2. <input type="checkbox"/> b	6.2. <input type="checkbox"/> c M <input type="checkbox"/>
6.2. Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 <input type="checkbox"/>	[] [] []		6.2. <input type="checkbox"/> b	6.2. <input type="checkbox"/> c M <input type="checkbox"/>

ADDITIONAL INFORMATION ON WASTE TREATMENT METHODS AND EFFICIENCY (Part III, Section 7)

A. General Wastestream (enter code in box provided)	B. Treatment Method (enter code in box provided)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes No
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []

(Important: Type or print; read instructions before completing form.)



U.S. Environmental Protection Agency

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

EPA FORM

R**PART I.
FACILITY
IDENTIFICATION
INFORMATION**

(This space for your optional use.)

Public reporting burden for this collection of information is estimated to vary from 30 to 34 hours per response, with an average of 32 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch (PM-223), US EPA, 401 M St., SW, Washington, D.C. 20460 Attn: TRI Burden and to the Office of Information and Regulatory Affairs, Office of Management and Budget Paperwork Reduction Project (2070-0093), Washington, D.C. 20503.

1.	1.1 Are you claiming the chemical identity on page 3 trade secret? <input type="checkbox"/> Yes (Answer question 1.2: Attach substantiation forms.) <input checked="" type="checkbox"/> No (Do not answer 1.2: Go to question 1.3.)	1.2 If "Yes" in 1.1, is this copy: <input type="checkbox"/> Sanitized <input type="checkbox"/> Unsanitized	1.3 Reporting Year 19 <u>88</u>
----	--	---	------------------------------------

2. CERTIFICATION (Read and sign after completing all sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official

CARLOS R. SANTIAGO ENGINEERING MANAGER

Signature

Date signed

3. FACILITY IDENTIFICATION

3.1	Facility or Establishment Name OLAY COMPANY, INC.		WHERE TO SEND COMPLETED FORMS: 1. U.S. ENVIRONMENTAL PROTECTION AGENCY P.O. BOX 70266 WASHINGTON, DC 20024-0266 ATTN: TOXIC CHEMICAL RELEASE INVENTORY 2. APPROPRIATE STATE OFFICE (See instructions Appendix E)
	Street Address ROAD 735, Km. 2.3		
	City CAYEY	County	
	State PUERTO RICO	Zip Code 00633	

3.2	This report contains information for (Check one): a. <input checked="" type="checkbox"/> An entire facility. b. <input type="checkbox"/> Part of a facility.
-----	---

3.3	Technical Contact WILLIAM CARRION-HERNANDEZ	Telephone Number (include area code) (809) 738-2191
-----	--	--

3.4	Public Contact LESBIA B. DIAZ	Telephone Number (include area code) (809) 738-2191
-----	----------------------------------	--

3.5	SIC Code (4 digit) a. 2834 b. c. d. e. f.
-----	--

3.6	Latitude			Longitude		
	Degrees 66	Minutes 08	Seconds 25	Degrees 18	Minutes 07	Seconds 38

3.7	Dun & Bradstreet Number(s) a. 01-741-1737 b. N/A
-----	---

3.8	EPA Identification Number(s) (RCRA I.D. No.) a. PRD090461930 b. N/A
-----	--

3.9	NPDES Permit Number(s) a. N/A b. N/A
-----	---

3.10	Receiving Streams or Water Bodies (enter one name per box) a. N/A b.
	c. N/A d.
	e. N/A f.

3.11	Underground Injection Well Code (UIC) Identification Number(s) a. N/A b.
------	---

4. PARENT COMPANY INFORMATION

4.1	Name of Parent Company PROCTER & GAMBLE COMPANY
4.2	Parent Company's Dun & Bradstreet Number 00-131-6827



EPA FORM R

PART II. OFF-SITE LOCATIONS TO WHICH TOXIC
CHEMICALS ARE TRANSFERRED IN WASTES

(This space for your optional use.)

1. PUBLICLY OWNED TREATMENT WORKS (POTWs)

1.1 POTW name "EL TORITO" WWTP		1.2 POTW name	
Street Address EL TORITO		Street Address	
City CAYEY	County N/A	City	County
State PUERTO RICO	Zip 00634	State	Zip

2. OTHER OFF-SITE LOCATIONS (DO NOT REPORT LOCATIONS TO WHICH WASTES ARE SENT ONLY FOR RECYCLING OR REUSE).

2.1 Off-site location name N/A		2.2 Off-site location name	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? [] Yes [] No		Is location under control of reporting facility or parent company? [] Yes [] No	

2.3 Off-site location name N/A		2.4 Off-site location name	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? [] Yes [] No		Is location under control of reporting facility or parent company? [] Yes [] No	

2.5 Off-site location name N/A		2.6 Off-site location name	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? [] Yes [] No		Is location under control of reporting facility or parent company? [] Yes [] No	

[] Check if additional pages of Part II are attached. How many? _____

EPA FORM R
PART III. CHEMICAL-SPECIFIC INFORMATION

(This space for your optional use.)

1. CHEMICAL IDENTITY (Do not complete this section if you complete Section 2.)

1.1	[Reserved]
1.2	CAS Number (Enter the number exactly as it appears on the 313 list. Enter NA if reporting a chemical category.) 001310-73-2
1.3	Chemical or Chemical Category Name (Enter the name exactly as it appears on the 313 list.) SODIUM HYDROXIDE SOLUTION
1.4	Generic Chemical Name (Complete only if Part I, Section 1.1 is checked "Yes." Generic name must be structurally descriptive.)

2. MIXTURE COMPONENT IDENTITY (Do not complete this section if you complete Section 1.)

Generic Chemical Name Provided by Supplier (Limit the name to a maximum of 70 characters (e.g., numbers, letters, spaces, punctuation).)

3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Check all that apply.)

3.1	Manufacture the chemical:	a. <input type="checkbox"/> Produce.	If produce or import:		d. <input type="checkbox"/> For sale/distribution
		b. <input type="checkbox"/> Import	c. <input type="checkbox"/> For on-site use/processing	e. <input type="checkbox"/> As a byproduct	f. <input type="checkbox"/> As an impurity
3.2	Process the chemical:	a. <input type="checkbox"/> As a reactant	b. <input type="checkbox"/> As a formulation component	c. <input type="checkbox"/> As an article component	
		d. <input type="checkbox"/> Repackaging only			
3.3	Otherwise use the chemical:	a. <input type="checkbox"/> As a chemical processing aid	b. <input type="checkbox"/> As a manufacturing aid	c. <input checked="" type="checkbox"/> Ancillary or other use	

4. MAXIMUM AMOUNT OF THE CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

04 (enter code)

5. RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE

You may report releases of less than 1,000 lbs. by checking ranges under A.1. (Do not use both A.1 and A.2)		A. Total Release (lbs/yr)		B. Basis of Estimate (enter code)	C. % From Stormwater
		A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
5.1 Fugitive or non-point air emissions	5.1a	[] [] [] []	0	5.1b	0
5.2 Stack or point air emissions	5.2a	[] [] [] []	N/A	5.2b	
5.3 Discharges to receiving streams or water bodies (Enter letter code from Part I Section 3.10 for stream(s) in the box provided.)	5.3.1 <input type="checkbox"/>	5.3.1a	[] [] [] []	5.3.1b	N/A
	5.3.2 <input type="checkbox"/>	5.3.2a	[] [] [] []	5.3.2b	
	5.3.3 <input type="checkbox"/>	5.3.3a	[] [] [] []	5.3.3b	
5.4 Underground Injection	5.4a	[] [] [] []	N/A	5.4b	
5.5 Releases to land	5.5.1 On-site landfill	5.5.1a	[] [] [] []	5.5.1b	
	5.5.2 Land treatment/application farming	5.5.2a	[] [] [] []	5.5.2b	
	5.5.3 Surface impoundment	5.5.3a	[] [] [] []	5.5.3b	
	5.5.4 Other disposal	5.5.4a	[] [] [] []	5.5.4b	
[] (Check if additional information is provided on Part IV-Supplemental Information.)					



EPA FORM R
PART III. CHEMICAL-SPECIFIC INFORMATION
(continued)

(This space for your optional use.)

6. TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS

You may report transfers of less than 1,000 lbs. by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (lbs/yr)		B. Basis of Estimate (enter code)	C. Type of Treatment/Disposal (enter code)
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
6.1.1 Discharge to POTW (enter location number from Part II, Section 1.) <input type="checkbox"/> 1 <input type="checkbox"/>	[] [] []	0	6.1.1b <input type="checkbox"/> 0	
6.2.1 Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 <input type="checkbox"/>	[] [] []	N/A	6.2.1b <input type="checkbox"/>	6.2.1c <input type="checkbox"/> M <input type="checkbox"/>
6.2.2 Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 <input type="checkbox"/>	[] [] []	N/A	6.2.2b <input type="checkbox"/>	6.2.2c <input type="checkbox"/> M <input type="checkbox"/>
6.2.3 Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 <input type="checkbox"/>	[] [] []	N/A	6.2.3b <input type="checkbox"/>	6.2.3c <input type="checkbox"/> M <input type="checkbox"/>

[] (Check if additional information is provided on Part IV-Supplemental Information.)

7. WASTE TREATMENT METHODS AND EFFICIENCY

A. General Wastestream (enter code)	B. Treatment Method (enter code)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes No
7.1a <input type="checkbox"/> W	7.1b <input type="checkbox"/> C <input type="checkbox"/> 1 <input type="checkbox"/> 1	7.1c <input type="checkbox"/> 3	7.1d []	7.1e 100 %	7.1f [] [X]
7.2a <input type="checkbox"/>	7.2b <input type="checkbox"/>	7.2c <input type="checkbox"/>	7.2d []	7.2e %	7.2f [] []
7.3a <input type="checkbox"/>	7.3b <input type="checkbox"/>	7.3c <input type="checkbox"/>	7.3d []	7.3e %	7.3f [] []
7.4a <input type="checkbox"/>	7.4b <input type="checkbox"/>	7.4c <input type="checkbox"/>	7.4d []	7.4e %	7.4f [] []
7.5a <input type="checkbox"/>	7.5b <input type="checkbox"/>	7.5c <input type="checkbox"/>	7.5d []	7.5e %	7.5f [] []
7.6a <input type="checkbox"/>	7.6b <input type="checkbox"/>	7.6c <input type="checkbox"/>	7.6d []	7.6e %	7.6f [] []
7.7a <input type="checkbox"/>	7.7b <input type="checkbox"/>	7.7c <input type="checkbox"/>	7.7d []	7.7e %	7.7f [] []
7.8a <input type="checkbox"/>	7.8b <input type="checkbox"/>	7.8c <input type="checkbox"/>	7.8d []	7.8e %	7.8f [] []
7.9a <input type="checkbox"/>	7.9b <input type="checkbox"/>	7.9c <input type="checkbox"/>	7.9d []	7.9e %	7.9f [] []
7.10a <input type="checkbox"/>	7.10b <input type="checkbox"/>	7.10c <input type="checkbox"/>	7.10d []	7.10e %	7.10f [] []

[] (Check if additional information is provided on Part IV-Supplemental Information.)

8. OPTIONAL INFORMATION ON WASTE MINIMIZATION

(Indicate actions taken to reduce the amount of the chemical being released from the facility. See the instructions for coded items and an explanation of what information to include.)

A. Type of Modification (enter code)	B. Quantity of the Chemical in Wastes Prior to Treatment or Disposal		C. Index	D. Reason for Action (enter code)
	Current reporting year (lbs/yr)	Prior year (lbs/yr)	Or percent change	
<input type="checkbox"/> M <input type="checkbox"/>			% <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> R <input type="checkbox"/>



EPA FORM R

PART IV. SUPPLEMENTAL INFORMATION

Use this section if you need additional space for answers to questions in Part III. Number the lines used sequentially from lines in prior sections (e.g., 5.3.4, 6.1.2, 7.11)

(This space for your optional use.)

ADDITIONAL INFORMATION ON RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE
 (Part III, Section 5.3)

You may report releases of less than 1,000 lbs. by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Release (lbs/yr)		B. Basis of Estimate (enter code in box provided)	C. % From Stormwater
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
5.3 Discharges to receiving streams or water bodies 5.3. <input type="checkbox"/>	5.3. <input type="checkbox"/> a [] [] []		5.3. <input type="checkbox"/> b	5.3. <input type="checkbox"/> c
(Enter letter code from Part I Section 3.10 for stream(s) in the box provided.) 5.3. <input type="checkbox"/>	5.3. <input type="checkbox"/> a [] [] []		5.3. <input type="checkbox"/> b	5.3. <input type="checkbox"/> c
5.3. <input type="checkbox"/>	5.3. <input type="checkbox"/> a [] [] []		5.3. <input type="checkbox"/> b	5.3. <input type="checkbox"/> c

ADDITIONAL INFORMATION ON TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS
 (Part III, Section 6)

You may report transfers of less than 1,000 lbs. by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (lbs/yr)		B. Basis of Estimate (enter code in box provided)	C. Type of Treatment/Disposal (enter code in box provided)
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
6.1. Discharge to POTW (enter location number from Part II, Section 1.) <input type="checkbox"/> 1 <input type="checkbox"/>	[] [] []		6.1. <input type="checkbox"/> b	
6.2. Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 <input type="checkbox"/>	[] [] []		6.2. <input type="checkbox"/> b	6.2. <input type="checkbox"/> c M <input type="checkbox"/> <input type="checkbox"/>
6.2. Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 <input type="checkbox"/>	[] [] []		6.2. <input type="checkbox"/> b	6.2. <input type="checkbox"/> c M <input type="checkbox"/> <input type="checkbox"/>
6.2. Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 <input type="checkbox"/>	[] [] []		6.2. <input type="checkbox"/> b	6.2. <input type="checkbox"/> c M <input type="checkbox"/> <input type="checkbox"/>

ADDITIONAL INFORMATION ON WASTE TREATMENT METHODS AND EFFICIENCY (Part III, Section 7)

A. General Wastestream (enter code in box provided)	B. Treatment Method (enter code in box provided)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes No
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []

REFERENCE 23

December 11, 1984

Mr. Juan A. Folch
Engineering Manager
Vicks, Inc.
Box 7000
Cayey, Puerto Rico
00633

RE: Reclassification
Application - Vicks, Inc.

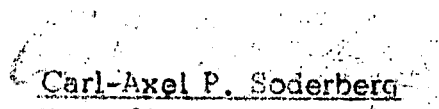
Dear Mr. Folch:

Reference is made to the above mentioned subject.

You are hereby informed that the Puerto Rico Environmental Quality Board, under Section 3006 of the Phase I Interim Authorization of the Resource Conservation and Recovery Act, RCRA, has approved the petition requested by Vicks, Inc., PRD090461930 of Generator to small quantity Generator.

This approval is valid only under the conditions of the information submitted in the petition.


Luis E. de la Cruz
Associate Member


Carl-Axel P. Soderberg
Vice-Chairman


Pedro A. Gelabert
Chairman

LF/sec

>

REFERENCE 24



COMMONWEALTH OF PUERTO RICO / OFFICE OF THE GOVERNOR

Environmental
Quality Board

October 11, 1984

MEMORANDUM

TO : María V. Rodríguez *MVR*
Acting Chief
Inspection, Monitoring
& Surveillance Section

FROM : Lourdes M. Figueroa *LMF*
Environmental Inspector

SUBJECT : Full RCRA Generator Inspection
Vicks, Inc.

Vicks, Inc., located in Cayey, Puerto Rico, was visited on September 24, 1984 with the purpose of performing a Full RCRA Generator Inspection.

The following documents related to this inspection are enclosed:

Inspection Report

Notification to the industry

RCRA Generator Inspection Form

Coding Sheet

SUMMARY OF FINDINGS

On September 24, 1984, Vicks, Inc. PRD090461930, located on Road No. 375 Km. 23, Rincón Ward, Cayey, Puerto Rico, was visited. The telephone number is (809) 738-2191.

The purpose of the visit was to perform a Full RCRA Generator Inspection, according to the state regulation, Regulation for the Control of Hazardous and Non - Hazardous Solid Wastes, amended version.

During the inspection, Mr. José Carrasquillo, Plant Engineer of the company, met with technical personnel of the Inspection, Monitoring and Surveillance Section, Environmental Quality Board and the following information was gathered:

The industry manufacture Oil of Olay, Night of Olay, Vicks Inhalator, Vicks Vaporups, Percogesics, Day Care Tablets and Sinex. The Sinex products is a nasal spray, trade-name Sinex, with descongestant characteristic and that contains thimerosal as a preservative. The thimerosal is a mercury salicylate, crystalline organic mercurial acid used as an antiseptic and germicide. The wash waters from the sanitation procedure are stored in (55) fifty-five gallon drums and disposed off in a treatment plant to be detoxified. The detoxification process consists in a tank that collect the wastewaters, addition of sodium hydroxide to increase the pH, agitation to obtain appropriate mixing and a filter remove the solids from the chemical reactions. A carbon bed system absorb the remaining mercury from the washwaters and is transferred to the Vicks, Inc. water treatment facilities then discharged to the sewer system.

At the time of the inspection the company has stored around 10 fifty-five gallons drums of washwaters and 5 fifty-five gallons drums of carbon filters, that has been disposed in Servicios Carbareón to be immobilized with kiln dust.

The drums were found labeled according to the state regulation, and the storage area is fenced and have signs posted.

In regard to the documents evaluation, at the time of the inspection the company do not have copy of the following documents to be evaluated:

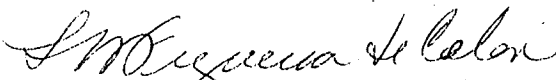
- 1) The inspection log book

2) Personnel Training

3) Contingency Plan and Emergency Procedures

The company submit a re-classification petition to small quantity generator. At least the company submit the documents for its evaluation and be evaluated, we continue with the procedures to approve this petition.

All the above mentioned was personally observed by:


Lourdes M. Figueroa de Colón
Environmental Inspector

SUMMARY AND CONCLUSION

At the time of the inspection, Vicks, Inc. was not in compliance with the standards applicable to Generators of Hazardous Wastes.

The following violations were found and/or observed during the inspection:

Class III Violations:

- 1) Rule 812 (E) Records of Inspection performed to the storage area.
- 2) Rule 808 C Personnel Training
- 3) Rule 810 Preparedness and Prevention
- 4) Rule 207 Contingency Plan and Emergency Procedures

Recommendations:

Send a letter to Mr. Carrasquillo of Vicks, Inc. in which thirty (30) days be granted to comply with the above mentioned violations.

REFERENCE 25

TELEPHONE (809) 738-2191
TELEX 385-5504

VICKS, INC.

Box V - Cayey, Puerto Rico 00633

CABLE ADDRESS:
MERVI

June 13, 1984

Amg

Ms. Christina A. Demo
Environmental Protection Specialist
Permit Administration Branch
Environmental Protection Agency
Region II, 26 Federal Plaza
New York, New York 10273

Dear Ms. Demo:

Re: Generator Facility Ownership Change and Transfer of
RCRA E.P.A. ID Number PRDO90450255

On June 12, 1984, we received a copy of a letter from
Mr. Thomas M. Vinciguerra indicating that the facility name
and owner of E.P.A. ID No. PRDO90450255 is now Olay Company
of Richardson-Vicks, Inc.

I would like to emphasize that Olay Company, Inc. is
not a generator of any hazardous waste and that the only
company with an E.P.A. ID No. (PRDO90461930) is Vicks Inc.,
a subsidiary of Richardson-Vicks Inc.

We feel that the previous Merrell-National Labs., Inc.
E.P.A. ID Number should be cancelled in its entirety since
they ceased operations on the Island in 1982.

Sincerely,

Emilio Escobar

Emilio Escobar
Engineering Manager

ar

cc: N. Toledo - E.Q.B.
T. Vinciguerra- Merrell

REFERENCE 26

TELEPHONE (809) 738-2191
TELEX 385-5504

VICKS INC.

Box V - Cayey, Puerto Rico 00633

CABLE ADDRESS:
MERVI

August 29, 1983

Environmental Quality Board
Attn: Eng. Luis de la Cruz
Land Pollution Bureau
P.O. Box 11488
Santurce, PR 00910

RE: PRD 090461930

Dear Engineer de la Cruz:

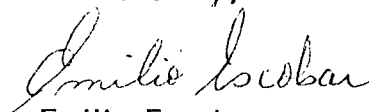
Attached is a completed "Application for Declassification of Facilities" that acquired certain status under the Resource Conservation and Recovery Act.

Vicks, Inc. is listed as a "Generator" of Hazardous Waste and is applying for status change to "Small Generator" of Hazardous Waste.

This application is prepared following guidelines approved by the Environmental Quality Board and made available to our Company on August 15, 1983.

If there are any questions, please convey them to my attention.

Yours truly,



Emilio Escobar
Engineering Manager

Enclosure

7208

I. NAME, ADDRESS AND TELEPHONE NUMBER OF AUTHORIZED REPRESENTATIVE

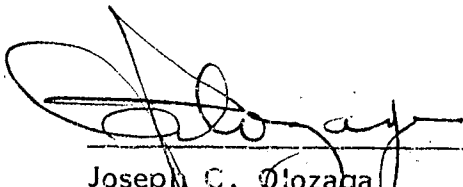
Eng. Emilio Escobar
Engineering Manager
Vicks, Inc.
Box V
Cayey, PR 00633
(809) 738-2191

II. NAME, ADDRESS AND TELEPHONE NUMBER OF APPLYING INDUSTRY

Vicks, Inc.
Cayey Este Industrial Park
Box V
Cayey, PR 00633
(809) 738-2191

III. CERTIFICATION OF COMPANY HIGHEST OFFICIAL

I certify under penalty of law that I have personally examined and I'm familiar with the information submitted in this document and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.



Joseph C. Olozaga
President & General Manager

September 1 - 83

Date

IV. PROCESS DESCRIPTION THAT GENERATES HAZARDOUS WASTE

Vicks, Inc. listed three different hazardous waste in its "Notification of Hazardous Waste Activity" on August 14, 1980.

The listed hazardous wastes from non-specific sources (F002 & F005) referred to solvents use in limited quantities, as reagents, in laboratory analyses performed in the plant Quality Control Laboratory. Some of the solvents used are included on Sub-Part D, 261.31 and because of this were listed inadvertently, without taking notice that because of the small amounts handled, these solvents were exempted of the notification requirements of Section 3010 of RCRA. These limited amounts of solvents are handled through the plant wastewater treatment plant.

The listed toxic waste referred to the sanitation procedure wastewaters of one of the Vicks, Inc. products. This product is a nasal spray, trade-name Sinex, with decongestant characteristics and that contains thimerosal as a preservative. The thimerosal is a mercury salicylate, crystalline organic mercurial acid used as an antiseptic and germicide.

After a batch of nasal spray is prepared and bottled, all the equipment and related lines used are sanitized for further use. The wastewaters from this sanitation procedure contains traces of the nasal spray product. A laboratory analysis of these wastewaters revealed a mercury content of 0.22 mg/liter. For this reason, the waste was classified as hazardous, and included in the notification. Since then, the waste has been collected in 55 gallon drums and disposed of in an off-site facility. At the same time, efforts were made to develop a procedure to detoxify the wastewaters.

The result of the efforts to detoxify the wastewaters has been the design of a system that extracts the mercury and permits the discharge of the wastewaters to a publicly-owned treatment works. The detoxification processes consists of: a tank to collect the wastewaters, addition of, sodium hydroxide to increase the pH of the liquor, mechanical agitation to obtain appropriate mixing, a filter to remove the solids from chemical reactions of the chemicals in the waste under alkaline conditions (including mercury sulfide), a carbon bed system to absorb the remaining mercury from the liquor, a pumping device to recirculate the liquor through the filter and carbon beds, and to transfer it to the Vicks, Inc. water treatment facilities. A process flow diagram is included for further information.

The system is designed to handle batches of the wastewaters accumulated in one week. Each batch treated will be slowly added (1.0 gallon per minute) to the influent system going into Vicks, Inc. treatment facilities that includes pH control. The Vicks, Inc. input to the publicly-owned treatment work is 30,000 gallons per day. So, the weekly addition of the detoxified batch of nasal spray wastewaters, usually 500 gallons, will not cause a significant additional load.

Most of the mercury will precipitate as mercury sulfide, along with other salts. This mercury sulfide containing solid will be filtered out of the liquor. The amount of solid accumulated monthly will be filtered out of the liquor. The amount of solid accumulated monthly will fluctuate around the 2.5 kilograms figure. There is knowledge that it will exceed the EP Toxic characteristics defined for mercury. But, because of the small quantity generated it is excluded from regulation under 40 CFR 261.5

V. DETAILED EXPLANATION FOR DECLASSIFICATION PETITION

On August 14, 1980 Vicks, Inc. submitted a "Notification of Hazardous Waste Activity". In that notification hazardous wastes from non-specific sources, F002 and F005, and a non-listed hazardous waste, toxic, were listed as handled by the company.

A revision of the RCRA regulations points out the need to reclassify our hazardous waste activity. Actually, Vicks, Inc. is listed as a generator of hazardous waste, when the reality is that now our company is a small generator and as such should be exempted from regulation under 40 CFR Parts 262 through 265 and Parts 122 through 124. Vicks, Inc. acknowledges its duty to handle small quantities of hazardous wastes in an off-site treatment, storage and disposal facility that complies with 40 CFR 261.5.d.

Included in this petition is a copy of the transmittal letter to PRASA and authorization from Julio Pujols Machín to discharge this effluent into their sewer system.

The records and analyses results of batches treated are available for inspection.

VI.

AFFIDAVIT

Affidavit No. 3497

Sworn and subscribed before me by Emilio Escobar, responsible official of Vicks, Inc. of legal age, civil status married and resident of Caguas, Puerto Rico.

In Cayey, Puerto Rico, this 1st day of September 1983.

Notary Public

REFERENCE 27

VICKS, INC.

TELEPHONE (809) 738-2191

Box V Cayey, Puerto Rico 00633

CABLE ADDRESS:

TELEX 385-504

MERVI

December 17, 1982

Dr. Richard Baker, Director
Permits Administration Branch
US EPA, Region II
26 Federal Plaza
New York, New York 10007

Re: EPA ID PRD 090461930
Reclassification as Small
Generator Under RCRA

Dear Dr. Baker:

On August 14, 1980 Vicks Inc., submitted a "Notification of Hazardous Waste Activity". In that notification hazardous wastes from non-specific sources, F002 and F005, and a non-listed hazardous waste, toxic, were listed as handled by the company.

A revision of the RCRA regulations points out the need to reclassify our hazardous waste activity. Actually, Vicks Inc. is listed as a generator of hazardous waste, when the reality is that now our company is a small generator and as such should be exempted from regulation under 40 CFR Parts 262 through 265 and Parts 122 through 124. Vicks Inc. acknowledges its duty to handle small quantities of hazardous wastes in an off-site treatment, storage and disposal facility that complies with 40 CFR 261.5.d.

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December 17, 1982

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Most of the mercury will precipitate as mercury sulfide, along with other salts. This mercury sulfide containing solid will be filtered out of the liquor. The amount of solid accumulated monthly will fluctuate around the 2.5 kilograms figure. There is knowledge that it will exceed the EP Toxic characteristics defined for mercury. But, because of the small quantity generated it is excluded from regulation under 40 CFR 261.5.

Vicks Inc. is respectfully requesting the Environmental Protection Agency to reclassify our facility as small generator and to exempt it from RCRA requirements except for those special requirements for hazardous waste generated by small quantity generators.

If there is a need for further information, do not hesitate to contact us. We will be glad to provide help that expedites this case.

Cordially yours,

Emilio Escobar
Engineering Manager

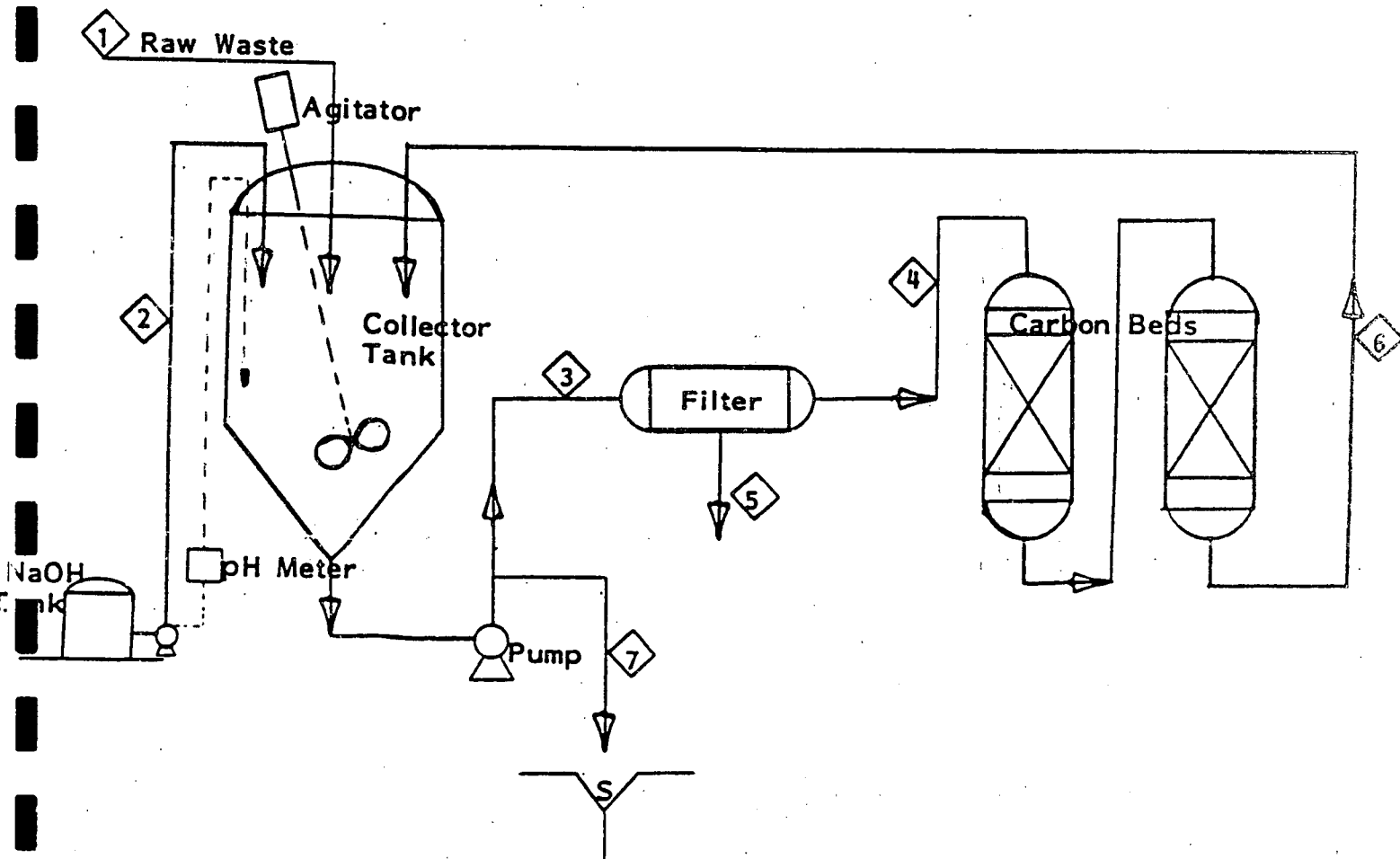
ar

cc: Eng. Luis E. de la Cruz - EPA
Eng. Carlos E. O'Neill - EQB

Batch: 500 gal of Sinex Wastewater

Component (lbs/hr)	1*	2*	3	4	5	6	7	8			
Water	4,170	83.4	500.4	500.4	--	500.4	500.4				
Total Organic Carbon (ppm)	3,000	--	3,000	1,000	2,000	500	500				
Mercury (ppm)	1-3	--	1-3	1-2	0-2	.005-1	0.005				
NaOH (50%)	---	83.4	--	---	---	---	---				
Settleable Solids	---	--	1	0.05	0.95	--	--				
pH	7	13 +	10.5-11	10.5-11	---	10.5-11	10.5-11				

* Batch quantities



Process Flow Diagram
Sinex Wastewater Treatment System

DRAWN S. Colón SCALE N/A
DATE Dec./01/81 SK-

REFERENCE 28

VICKS INC.

TELEPHONE (809) 738-2191

TELEX 395-5504

Box V - Cayey, Puerto Rico 00633

CABLE ADDRESS:

MERVI

1 de junio de 1982

Ing. Julio Pujols, Jefe
División Sistemas de Alcantarillados
Auto. de Acueductos y Alcantarillados
Apartado 7066
Bo. Obrero, Santurce, PR 00916

Re: AAA-U-74-3-25-V-270
Vicks Merrell Nat. Labs.

Estimado Ing. Pujols:

La presente es una consulta para la descarga de un desperdicio líquido pre-tratado y que será sumado a la presente carga de esta compañía al servicio de alcantarillado suministrado por su Agencia.

En un futuro cercano nuestra compañía planea construir una planta de detoxificación de un desperdicio líquido generado en la manufactura del atomizador nasal marca SINEX.

Este atomizador nasal es producido y empacado en nuestras facilidades en Cayey. El producto contiene materiales químicos orgánicos con características medicinales y contiene timerosal como preservativo. El timerosal es un salicilato mercurico que se usa como antiséptico y germicida.

Cada vez que se prepara un lote del atomizador nasal, todo el equipo y líneas son sanitizadas para usos futuros. El agua resultante de estos lavados contiene trazas del producto. Análisis de laboratorio demostraron que la concentración de mercurio sobrepasaba las 0.20 mg/litro. Por esta razón, este desperdicio fue clasificado como peligroso. La práctica actual es recogerlo en drones de 55 galones y depositarlo en una facilidad contratada para esos efectos. Aparte de la concentración de mercurio encontrada, ninguna otra sustancia que contenga el desperdicio se puede considerar como peligrosa; de hecho, el 99% de este desperdicio es agua.

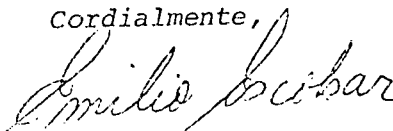
Para eliminar la característica de tóxico de estas aguas de lavado se ha diseñado una planta de tratamiento. La misma consiste de: un tanque para acumular el líquido, un sistema para aumentarle el nivel de alcalinidad, mezclado mecánico, un filtro para remover los sólidos formados cuando se aumenta la alcalinidad (incluyendo sulfito de mercurio), un sistema de camas de carbón activado para absorber el mercurio que no precipitó, una bomba para recircular el líquido por el filtro y las camas de carbón el tiempo que sea necesario para bajar el nivel de mercurio. El sistema está diseñado para tratar lotes de líquido acumulados en una semana, +500 galones. Se acompaña un diagrama de proceso del sistema de tratamiento para su información.

El líquido tratado se descargará a las facilidades existentes de tratamiento de Vicks Inc. Estas facilidades incluyen control de PH. Se estarán añadiendo los 500 galones una vez a la semana, a una razón de 1.0 galón por minuto. Esta actividad no causará una carga adicional significativa sobre los cerca de 30,000 galones por día que ya descarga Vicks Inc. al sistema de alcantarillado desde su planta de tratamiento existente.

Como dato informativo añadimos que el sólido recogido en el filtro y que tendrá características de peligroso, será manejado de acuerdo a los Reglamentos Federales y Estatales que apliquen.

Vicks Inc., respetuosamente, le solicita que evalúe la información suministrada y que nos notifique por escrito su opinión con respecto a esta consulta.

Cordialmente,



Emilio Escobar
Gerente de Ingenieria

ar

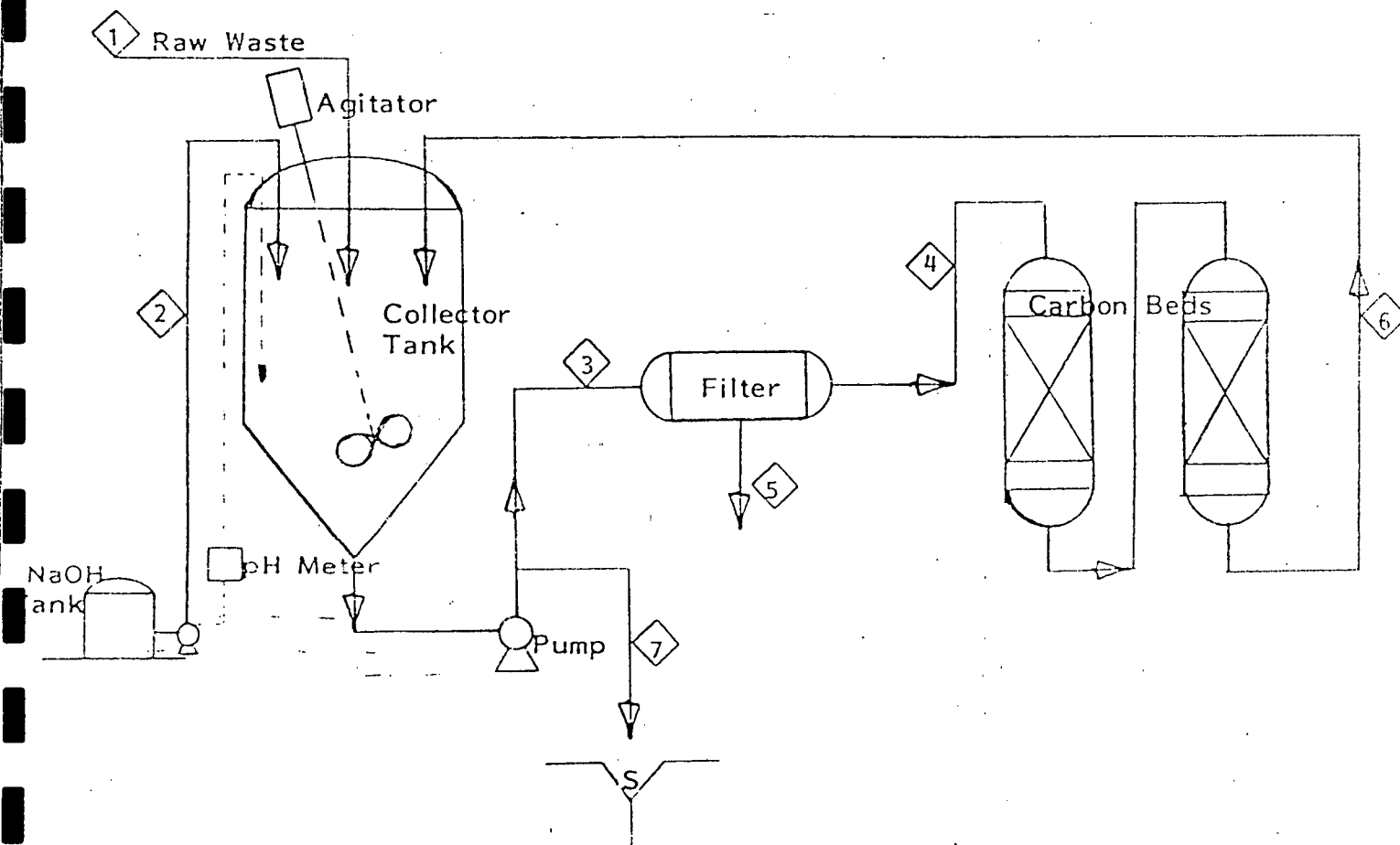
cc: Ing. Alexander Melendez
A.A.A.

Anexos

Batch: 500 gal of Sinex Wastewater

Component (lbs/hr)	1*	2*	3	4	5	6	7	8			
Water	4,170	83.4	500.4	500.4	--	500.4	500.4				
Total Organic Carbon (ppm)	3,000	--	3,000	1,000	2,000	500 - 1,000	500				
Mercury (ppm)	1-3	--	1-3	1-2	0-2	.005-1	0.005				
NaOH (50%)	---	83.4	--	--	--	--	--				
Settleable Solids	---	--	1	0.05	0.95	--	--				
pH	7	13 +	10.5-11	10.5-11	---	10.5-11	10.5-11				

* Batch quantities



Process Flow Diagram
Sinex Wastewater Treatment System

DRAWN S. Colón SCALE N/A
DATE Dec. /01/81 SK-

REFERENCE 29

SERVICIOS CARBAREON, INC.

MAILING ADDRESS:
FIRM DELIVERY
PONCE, P. R. 00731

CARR. 385 KM. 3.5 - BO. TALLABOA
PENUELAS, P. R. 00724

TELS.
(809) 836-1678
(809) 836-2058

2 de octubre de 1979

Sr. Jaime L. Ortíz Otero, Director
Area de Contaminación de Terrenos
Junta de Calidad Ambiental
Apartado 11488
Santurce, P.R. 00910

RE: Petición Vicks-Merrell
9 de agosto de 1979

Estimado Sr. Ortíz:

Sirva la presente para respetuosamente solicitar una reconsideración a las recomendaciones dadas a la compañía Vicks-Merrell y que se refieren a la solicitud para disponer de desperdicios líquidos de su proceso.

Según fue discutido en reunión celebrada el día 1ro. de octubre de 1979 en las oficinas de la División de Desperdicios Peligrosos el desperdicio en cuestión contiene trazas de el compuesto Timerosal, que es un preservativo a base de Mercurio. La función de dicho preservativo es mantener el medicamento Synex en condiciones que permitan su uso por seres humanos. La concentración de dicho preservativo en el medicamento es de 0.001%. El medicamento en cuestión es recomendado para despejar las fosas nasales, inhalándolo, cuando se sufre de catarro.

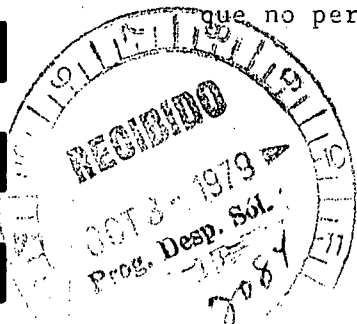
Es de la manufactura de este medicamento que el desperdicio en cuestión se genera. La cantidad de Mercurio que contiene el líquido a disponerse está atado químicamente en el Timerosal, y su concentración es de 0.22 mg/litro en el desperdicio en cuestión. En términos de cantidades a disponerse, se dispondrá de 5,500 galones inicialmente, conteniendo 0.22 mg/l ó 0.22ppm. Esto equivale a 4.58 gramos de Mercurio.

$$\begin{array}{|c|c|c|c|c|} \hline 0.22 \text{ MgHg} & \text{gr.} & 5,500 \text{ gals.} & 3.785 \text{ litro} & \\ \hline \text{litro} & 1,000\text{Mg} & & \text{gal} & \\ \hline \end{array} = 4.58 \text{ gr. Hg}$$

Luego se podrán generar hasta un máximo de 3,000 galones de desperdicio líquido por mes. En cuyo caso anualmente se dispondría de 29.98 gr. Hg por año.

$$\begin{array}{|c|c|c|c|c|c|} \hline .22 \text{ MgHg} & \text{gr.} & 3,000 \text{ gals.} & 3,785 \text{ litro} & 12 \text{ meses} & \\ \hline \text{litro} & 1,000 \text{ Mg} & & \text{gal} & \text{año} & \\ \hline \end{array} = 29.98 \frac{\text{gr. Hg}}{\text{año}}$$

La concentración del Mercurio en el desperdicio es de tal magnitud que no permite que sea recuperado con la tecnología existente. Más aún la



2 de octubre de 1979

cantidad de Mercurio generado como desperdicio hace económicamente no factible el construir algún tipo de facilidad para intentar tal recuperación. Si recordamos que el Mercurio es 13.6 veces más pesado que el agua, entonces estaríamos hablando de disponer, en términos de volumen de 0.34 ml de Mercurio inicialmente.

$$4,58 \text{ gr. Hg} \left| \frac{\text{ml Hg}}{13.6 \text{ gr Hg}} \right| = 0.34 \text{ ml Hg}$$

y de 2.2 ml de Mercurio anualmente.

$$29.98 \text{ gr Hg} \left| \frac{\text{ml Hg}}{13.6 \text{ gr Hg}} \right| = 2.2 \text{ ml Hg}$$

Nos tomamos la consideración de hacer los pasados cálculos para su beneficio ya que el método de disposición que Servicios Carbareón propone es el almacenar en lagunas de evaporación, para disminuir el volumen de agua a un mínimo, luego el residuo de desperdicio sólido, junto con otros residuos serán dispuestos de forma final en sistema de cultivación en el terreno. Esos otros residuos incluyen residuos de petróleo, pescado, carbón activado, aceites etc.

Haciendo un recuento de la literatura, encontramos que la cantidad de Mercurio que estamos manejando es menor que cantidades de Mercurio permitidas para consumo humano. Ejemplo es la cantidad de 0.5 mg/litro permitido en el pescado Atún en el mercado por la Foods and Drugs Administration.

Estamos conscientes que el Mercurio no debe entrar en la cadena alimenticia, por su habilidad para unirse en compuestos orgánicos. Pero si la FDA lo permite como preservativo en la forma de Timerosal en un producto directamente ligado a la cadena alimenticia, confiamos que nuestro método de disposición final sea lo suficientemente seguro como para mejorar cualquier otra alternativa que pudiese surgir para la disposición final del desperdicio en consideración.

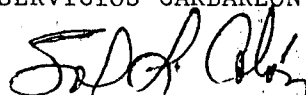
Basicamente nuestra intención es alejar lo más posible esta cantidad de Mercurio de cualquier medio que le permita reintegrarse a la cadena alimenticia. Adjunto incluyo literatura que ayuda a explicar nuestra petición de reconsideración.

Gracias anticipadas por conceder de su tiempo para estudiar nuestra petición.

Muy cordialmente,

cc: J.C. Olózaga, Presidente
Vicks-Merrell
Box M
Cayey, P.R. 00633

SERVICIOS CARBAREON, INC.



SOL L. COLON
Gerente de Operaciones

REFERENCE 30



ENVIRONMENTAL QUALITY BOARD
OFFICE OF THE GOVERNOR
SOLID WASTE PROGRAM

INDUSTRIAL HAZARDOUS AND TOXIC WASTE STUDY

GENERAL INFORMATION

Industry Name: Co. Vicks Merrell (4 años operando)

Local Address: Carr. 735 Km. 2.3 Cayey

Postal Address: _____

Telephone Number: 738-2191

Type of Industry: _____

Principal Product: Inhaladores - Vicks Oil of Eucalyptus

Owner or General Manager: Joseph Olazaga (Presidente o Gen. Manager)

Person (s) Responsible for the Hazardous or Toxic Waste Management: _____

Total Number of Employees: 240 - 250

Number of Employees Working Directly with the Hazardous or Toxic Wastes: _____

STORAGE FACILITIES

I RAW MATERIAL

A) Storage Station

Location Almacén en la planta

Condition Buenas

Containers Pilas de cartón, drums de fibras

Comments aceite mineral, ceras, perfumes, aceite de coco, Isopropyl myristate (para cosméticos)

Para la prod. de medif. cementos.

Calcium carbonate, Carbopolymethylene, Mannitol, Castor oil, Aminophylline, Zinc, Mg, Tartaric Acid, Norgestrel Succinate, Polymethylpyrrolidone, Ribavirin Phosphate, Ribavirin Dihydrate, Quinine sulfate, etc.

II Hazardous and Toxic Wastes Storage or Re-use

A) Storage Generalmente no almacenan mucho tiempo la materia prima. Se trata de renovar la mat. todo depende del aplicador.

Type _____

Location Almacén dentro de la planta en áreas con tal protección.

B) Re-use

Description En relación al material contaminado con Hg se envía a Greensboro en North Carolina para ser incinerado, consistía de 6 bultos de botellas de vidrio (Sedolador nasal).

Collection Facilities

() Municipal System

() Same Industry _____ Licence # _____

(✓) Private System Browning Irons Licence # _____

Other _____

Equipment Description : dumpster - compactador

Collection Frequency diariamente

FINAL DISPOSAL OF TREATMENT

SITE

SITE

ON OFF

ON OFF

() () Open Burning Dump

() () Open Dump

() () Land-fill

() () Mine Disposal

() () Incineration

() () Recovery & Re-use

() () Compaction

() () Lagooning as ultimate disposal

() () Ocean Dumping

() () Chemical & Biological
Detoxification

() () Sanitary Sewage

() () Other

System Description: Filtros para el agua del AAA. lo disponen
por la basura. Planta 3^{ra} de tratamiento para los
materiales o residuos de las 2 plantas. Una vez al año
viene una Co. y limpia el caso de la planta de
tratamiento. Se desconoce la cantidad que se recoge.
(7 15-18,000 gal) La Co. es Servicio Sanitario

Comments: Pública, Ruiz Belvis 244 Villa Palmeras,
San Juan, P.R. Lo transportan a Caguas. Cogen
terro lic. de la junta.

En cuanto a productos que no pasan el QC
se descuentan solo las botellas, las suelas y las echar
en diques y van al vertedero.

Special Treatment: Sacos de papel - echar basura que va al
vertedero. El cartón lo venden a la Fibers Industrial,
Box 624 Hato Rey, aprox. 50 tons / mes de cartón co-

Comments: recogido, 3 viajes / semana. Empty containers
se usan para echar basura. Bloques de metal - los re-
utilizan para echar desperdicios de cables de Hg.

Person Interviewed: Sr. Joseph Chazaga

Position: Presidente

Date:

Official: Normi Salido Macina

REFERENCE 31

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	PLEASE PLACE LABEL IN THIS SPACE
I. NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	
III. LOCATION OF INSTALLATION	

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS	

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)

I. NAME OF INSTALLATION
VICKS INC.

II. INSTALLATION MAILING ADDRESS
STREET OR P.O. BOX
BOX V

CITY OR TOWN	ST.	ZIP CODE
CAYEY	PR	00634

III. LOCATION OF INSTALLATION
STREET OR ROUTE NUMBER
ROAD #735, KM 2.3 BARRIO RINCON

CITY OR TOWN	ST.	ZIP CODE
CAYEY	PR	00633

IV. INSTALLATION CONTACT	
NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
ESCOBAR EMILIO - ENGINEERING MGR	809-738-2191

V. OWNERSHIP
A. NAME OF INSTALLATION'S LEGAL OWNER
RICHARDSON - VICKS INC.

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)	VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))
F = FEDERAL M = NON-FEDERAL	<input checked="" type="checkbox"/> A. GENERATION <input type="checkbox"/> B. TRANSPORTATION (complete item VII) <input type="checkbox"/> C. TREAT/STORE/DISPOSE <input type="checkbox"/> D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))
<input type="checkbox"/> A. AIR <input type="checkbox"/> B. RAIL <input type="checkbox"/> C. HIGHWAY <input type="checkbox"/> D. WATER <input type="checkbox"/> E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

<input type="checkbox"/> A. FIRST NOTIFICATION <input checked="" type="checkbox"/> B. SUBSEQUENT NOTIFICATION (complete item C)	C. INSTALLATION'S EPA I.D. NO.
	PRD090461930

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

1. FOR OFFICIAL USE ONLY									
5	6	7	8	9	10	11	12	13	14
1	2	3	4	5	6	7	8	9	10

X. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 2	2 F 0 0 5	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

<input type="checkbox"/> 1. IGNITABLE (D001)	<input type="checkbox"/> 2. CORROSIVE (D002)	<input type="checkbox"/> 3. REACTIVE (D003)	<input type="checkbox"/> 4. TOXIC (D000)
---	---	--	---

X. CERTIFICATION

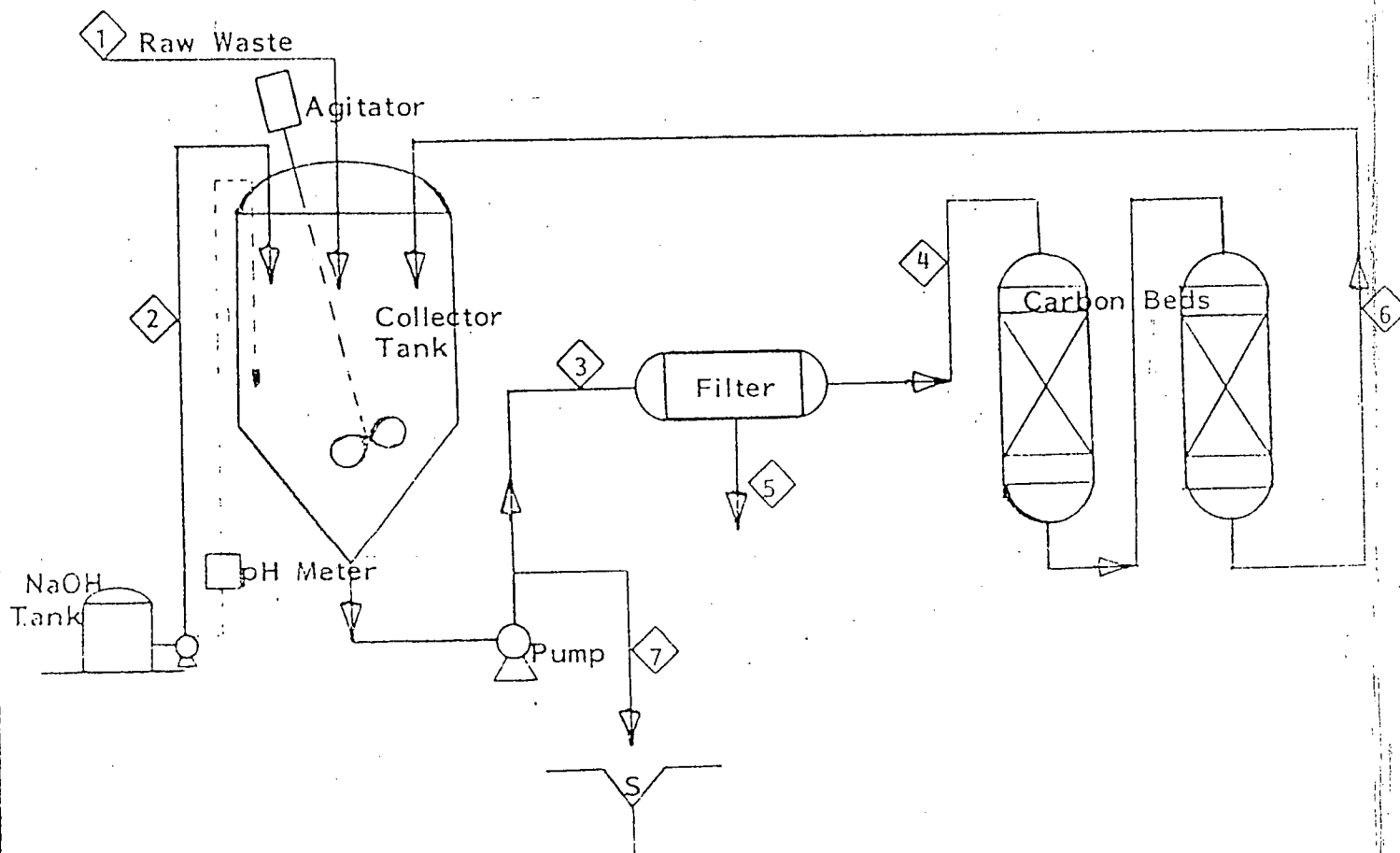
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) Joseph C. Olozaga - President	DATE SIGNED 6/3/82
---------------	--	-----------------------

Batch: 500 gal of Sinex Wastewater

Component (lbs/hr)	1*	2*	3	4	5	6	7	8			
Water	4,170	83.4	500.4	500.4	--	500.4	500.4				
Total Organic Carbon (ppm)	3,000	--	3,000	1,000	2,000	1,000	500				
Mercury (ppm)	1-3	--	1-3	1-2	0-2	.005-1	0.005				
NaOH (50%)	---	83.4	---	---	---	---	---				
Settleable Solids	---	--	1	0.05	0.95	--	--				
pH	7	13 +	10.5-11	10.5-11	--	10.5-11	10.5-11				

* Batch quantities



Process Flow Diagram
Sinex Wastewater Treatment System

DRAWN S. Colón SCALE N/A
DATE Dec./01/81 SK-

ariotec

San Juan, Puerto Rico 00936
tels. 754-7622 - 754-7566
telex - 385-9397

August 9, 1979

I.C.O. AUG1479

Environmental Quality Board
Box 11488
Santurce, Puerto Rico

Re: Vicks-Merrell
Cayey, PR

Gentlemen:

On behalf of the above client, we are submitting the following information regarding an aqueous waste which they would like to dispose of via Servicios Carbareon.

Source: Tank rinse from Synex Nasal Spray manufacture. A description of the process is attached.

Volume: There is an initial accumulation of about 5500 gallons, followed by 2500-3000 gallons per month.

Composition:

Total Solids - 0.17 percent

Mercury - 0.22 mg/liter

Product Residue - Trace amounts of the following ingredients
Synex Nasal spray:

Phenylephrine

Cetyl Pyridinium chloride

Menthol

Eucalyptol

Camphor

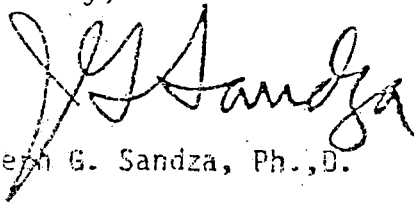
Methyl Salicylate

Thimerosal (a mercurial preservative)

August 10, 1979

It is our understanding that Carbareon will dispose of this water in an evaporation pond at their Peñuelas site.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. G. Sandza". The signature is written in dark ink and is positioned above the printed name.

Joseph G. Sandza, Ph.,D.

REFERENCE 32

RUIZ ④

0023469

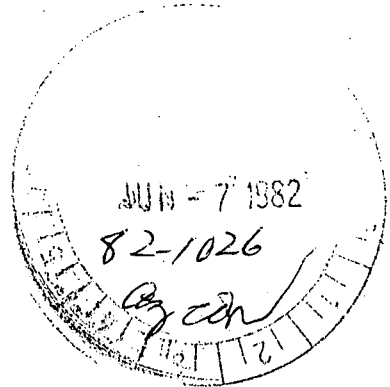
VICKS INC.

TELEPHONE (809) 738-2191
TELEX 385-5504

Box V - Cayey, Puerto Rico 00633

CABLE ADDRESS:
MERVI

June 1, 1982



Dr. Ernest Regna, Director
Solids Waste Branch
US - EPA
26 Federal Plaza
New York, New York 10007

Re: EPA ID. PRD 090461930

Dear Dr. Regna:

On August 14, 1980 the Vicks Inc. company submitted its "Notification of Hazardous Waste Activity". In that "first notification" a non-listed liquid waste was characterized as toxic.

The annexed "subsequent notification" incorporates changes related to the referred liquid waste. Please also note the changes in the sections: Installation Contact, Ownership, and Certification.

The need for this subsequent notification arises from the intention of Vicks Inc. to pre-treat this waste, detoxify it and pass the non-hazardous liquor through a sewer system to a publicly-owned treatment works for treatment. The liquor will represent a small fraction of the total volume passed through the sewer system, the bulk of the volume is treated sanitary waste.

A summary of the events that led to this subsequent notification is as follows:

The Vicks Inc. company manufactures a nasal spray, trade-name is SINEX, at its facilities in Cayey, Puerto Rico. The nasal spray contains organic chemicals with decongestant characteristics and contains thimerosal as a preservative. The thimerosal is a mercury salicylate, crystalline organic mercurial acid used as an antiseptic and germicide.

CERTIFIED

P17 7318607

MAIL

June 1, 1982

After a batch of nasal spray is prepared and bottled, all the equipment and related lines used are sanitized for further use. The wastewaters from this sanitation procedure contains traces of the nasal spray product. A laboratory analysis of these wastewaters revealed a mercury content of 0.22 mg/liter. For this reason, the waste was classified as hazardous, and included in the "first notification". Since then, the waste has been collected in 55 gallon drums and disposed of in an off-site facility. At the same time, efforts were made to develop a procedure to detoxify the wastewaters.

The result of the efforts to detoxify the wastewaters has been the design of a system that extracts the mercury and permits the discharge of the wastewaters to a publicly-owned treatment works. The detoxification processes consists of: a tank to collect the wastewaters, addition of sodium hydroxide to increase the PH of the liquor, mechanical agitation to obtain appropriate mixing, a filter to remove the solids from chemical reactions of the chemicals in the waste under alkaline conditions (including mercury sulfide), a carbon bed system to absorb the remaining mercury from the liquor, a pumping device to recirculate the liquor through the filter and carbon beds, and to transfer it to the Vicks Inc. water treatment facilities. A process flow diagram is included for further information.

The system is designed to handle the wastewaters accumulated in one week. Each batch treated will be slowly added (1.0 gallon per minute) to the influent system going into the Vicks Inc. treatment facilities that includes PH control. The Vicks Inc. input to the publicly-owned treatment works is 30,000 gallons per day. So, the weekly addition of the detoxified batch of nasal spray wastewaters, usually 500 gallons, will not cause a significant additional load.

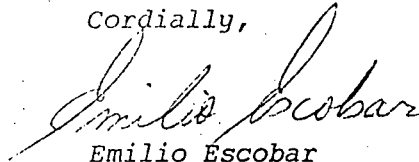
Now, most of the mercury will precipitate as mercury sulfide, along with other salts. This mercury sulfide containing solid will be filtered out of the liquor. The amount accumulated monthly will fluctuate around the 2.5 kilograms figure. There is knowledge that it will exceed the EP Toxic characteristics defined for mercury. But, because of the small quantity generated it is excluded from regulation under 40 CFR 261.5.

Vicks Inc. will dispose of this small quantity of hazardous waste in an off-site treatment, storage or disposal facility that complies with 40 CFR 261.5.d.

June 1, 1982

Vicks Inc. is respectfully asking the Environmental Protection Agency to delist the referred waste and to file the attached "subsequent notification" that supercedes the "first notification" file on August 14, 1980.

Cordially,



Emilio Escobar
Engineering Manager

ar

cc: Eng. Luis E. de la Cruz
E.Q.B. - Puerto Rico

Eng. Carlos E. O'Neill
E.P.A. - Caribbean Office

Enclosure

REFERENCE 33

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 Federal Plaza
New York, New York 10278

-----X	
In the Matter of	x
Vicks Inc./Merrell-National	x
Laboratories, Inc.	x
P.O. Box V	x
Cayey, Puerto Rico 00633	x
	x
Permit No. PR0023469	x
	x
Order pursuant to §309(a)(5)(A) of the	x
Clean Water Act, 33 U.S.C. §1319(a)(5)(A).	x
-----X	

FINDINGS OF VIOLATION
AND
ORDER FOR COMPLIANCE
EPA No. CWA-II-81-55

The following FINDINGS are made and ORDER issued pursuant to the authority vested in the Administrator of the United States Environmental Protection Agency ("EPA") by the Clean Water Act, 33 U.S.C. §1251 et seq. ("the Act"), and in particular §309(a)(5)(A) of that Act, 33 U.S.C. §1319(a)(5)(A). This authority has been duly delegated by the Administrator to the Regional Administrator of EPA, which authority has been duly re-delegated by the Regional Administrator of Region II to the Director, Enforcement Division, Region II.

FINDINGS

1. Vicks Inc./Merrell-National Laboratories, Inc. is a point source which operates a facility located at Road #735, Km. 2.3, Cayey, Puerto Rico, which discharges pollutants into an unnamed creek leading to the La Plata River, a navigable water of the United States.
2. The Company submitted an application for a National Pollutant Discharge Elimination System ("NPDES") permit to the EPA, Region II, on December 1, 1977.
3. Subsections 301(b)(1)(A) and (C) of the Act require all point sources of pollutants, other than publicly-owned treatment works, to achieve best practicable control technology currently available ("BPT") and any more stringent water quality standards ("WQS") by the final deadline of July 1, 1977.
4. The Company is presently unable to comply with the discharge limitations and/or the monitoring requirements which reflect BPT and/or any more stringent WQS as required by §301(b) of the Act and which are contained in its NPDES permit and, therefore, the Company is discharging pollutants in violation of §301 of the Act, 33 U.S.C. §1311.

5. Subsection 309(a)(5)(A) of the Act authorizes the EPA, Region II, through the issuance of an ORDER, to establish reasonable compliance schedules for a discharger in the case of a violation of a final deadline.

6. This ORDER does not constitute a waiver from compliance with any applicable requirements of the Act, regulations promulgated thereunder, local or State laws or regulations as well as any effective terms or conditions in the Company's NPDES permit No. PR0023469. This ORDER is an enforcement action taken by the EPA to ensure swift compliance with the Act and the Company's NPDES permit.

7. Violation of any condition of this ORDER shall result in revocation of such ORDER and further enforcement of the applicable requirements of the Act pursuant to the provisions of Section 309 of the Act, including possible judicial action for an injunction and for penalties and, in appropriate cases, criminal prosecution.

ORDERED

Upon thorough investigation of all relevant facts, taking into account the seriousness of the violation and any good faith efforts to comply with applicable requirements of the Act, the EPA, Region II, determines in accordance with §309(a)(5)(A) of the Act that compliance with the following conditions and requirements is reasonable. It is hereby ORDERED that:

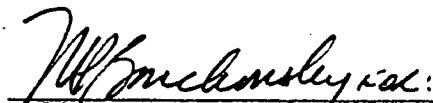
①. The Company shall comply with the monitoring requirements and schedule of compliance contained in Attachment A.

2. The Company shall comply with the Schedule of Compliance contained in Attachment A and shall within 14 calendar days following a date identified for specific actions submit written notice of compliance or noncompliance with such actions to Richard A. Baker, Ph.D., Chief, Permits Administration Branch, Planning and Management Division, U.S. Environmental Protection Agency, 26 Federal Plaza, New York, New York 10278. Any notice of noncompliance shall contain reasons for such noncompliance.

3. This ORDER shall take effect on that date listed as the effective date of the Company's NPDES permit.

Dated this 29th day of September
1981

By:


Julio Morales-Sanchez
Director
Enforcement Division
U.S. Environmental Protection Agency
Region II

ATTACHMENT A

This attachment is incorporated by reference into ORDER, EPA No. CWA-II-81-55.

The Company shall comply with the monitoring requirements and schedule of compliance set forth below.

I. Monitoring Requirements

During the period beginning on the effective date of the Company's NPDES permit No. PR0023469 and lasting through May 15, 1982 the Company is required to discharge treated effluent from outfall(s) serial number(s) 001 and monitor this discharge according to the following requirements:

<u>Effluent Characteristic</u>	<u>Monitoring Requirements</u>	
	<u>Measurement Frequency</u>	<u>Sample Type</u>
pH - SU	Daily	Grab
Flow-m ³ /day (MGD)	Continuous Recording	
BOD ₅ (Biochemical Oxygen Demand) - lbs/day, mg/l	Twice Monthly	Composite
Total Suspended Solids-lbs/day, mg/l	Twice Monthly	Composite
COD (Chemical Oxygen Demand - lbs/day, mg/l	Twice Monthly	Composite
Settleable Solids - ml/l	Daily	Grab
Fecal Coliforms - MPN/100 ml	Every 5 days	Grab
Total Coliforms - MPN/100 ml	Every 5 days	Grab
Residual Chlorine - mg/l	Daily	Grab
Dissolved Oxygen - mg/l	Daily	Grab
Oil and Grease - mg/l	Twice Monthly	Grab
Turbidity - JTU	Twice Monthly	Grab
Color - Co-Pt SU	Twice Monthly	Grab
Chlorides - mg/l	Every 5 days	Grab
Total Dissolved Solids - mg/l	Monthly	Grab
Total Phosphorous - ppb	Monthly	Grab
Nitrate plus Nitrite (as N) - mg/l	Monthly	Grab
Temperature - °C, °F	Daily	Grab

The above monitoring requirements are the same as those specified in the Company's NPDES permit No. PR0023469. Both daily average and daily maximum values in the units of measurement specified for each effluent characteristic will be reported.

Samples and measurements taken as required herein shall be representative of the volume of effluent flow and the quantity of pollutants discharged. All flow measurements shall achieve an accuracy within the range of $\pm 15\%$.

Monitoring results obtained during the previous 1 month shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1), postmarked

ATTACHMENT A

no later than the 28th day of the month following the completed reporting period. The first report is due on Jan. 28, 1982. Duplicate signed copies of these, and all other reports required herein, shall be submitted to the Regional Administrator and the State at the following addresses:

Regional Administrator
Region II
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

Environmental Quality Board of
Puerto Rico
P.O. Box 11488
Santurce, Puerto Rico 00910

ATTN: Water Quality Bureau

ATTN: Permits Administration Branch

Influent and effluent monitoring are required for BOD₅, COD, Settleable Solids and Suspended Solids. All other measurements and monitoring shall be required to be performed to the effluent at the specified location, except where otherwise indicated. Samples shall be obtained during peak flow $\pm 15\%$.

Samples taken in compliance with the monitoring requirements specified above shall be taken on the effluent at the outfall of discharge serial number 001 prior to admixture with any other substance or discharge to the receiving water.

II. Schedule of Compliance

The company shall comply with the following Schedule of Compliance and attain the discharge limitations and monitoring requirements as well as any other requirements of Condition A, Effluent Limitations and Monitoring Requirements, in the Company's NPDES permit by the date set forth in the Schedule of Compliance.

1. On or before May 15, 1982 all necessary construction for the discharge of all wastewater from the permittee's facility to PRASA's treatment plant in Cayey shall be completed and fully acceptable to the permittee.
2. During the period of effectiveness of the Company's NPDES permit the Company shall comply with all applicable provisions and requirements that are contained in the Company's NPDES permit.
3. For the period between the effective date of the Company's NPDES permit and May 15, 1982 the permittee shall submit progress reports every two months, detailing the status of the construction project and anticipated progress in attaining completion of the work as well as any other pertinent information.
4. Within ten days of availability the permittee shall submit a letter, signed by a duly authorized representative of the Company, specifying approval and acceptance of all construction work.
5. On or before May 15, 1982 the discharge of all wastewater from the above-referenced facility shall be made to the Puerto Rico Aqueduct and Sewer Authority's (PRASA) wastewater treatment plant in Cayey, Puerto Rico. Such discharge shall be maintained in conformance with all requirements specified by PRASA, the

ATTACHMENT A

Environmental Quality Board of Puerto Rico (EQB), and the U.S. Environmental Protection Agency (EPA). If the discharge of all wastewater is not connected to the PRASA system by this date and some or all of the wastewater continues to be discharged through the permittee's outfall 001 and into surface waters, such discharge will comply on said date with all effluent limitations and other requirements specified in the facility's NPDES permit No. PR0023469.

6. No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or non-compliance. In the latter case, the notice shall include the cause of non-compliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

The permittee shall submit copies of all reports and other material required herein to the following offices:

Richard A. Baker, Chief
Permits Administration Branch
Planning and Management Division
U.S. Environmental Protection Agency
26 Federal Plaza, Room 432
New York, New York 10278

Environmental Quality Board of
Puerto Rico
P.O. Box 11488
Santurce, Puerto Rico 00910

ATTN: Water Quality Bureau

REFERENCE 34

NOV 4 1977

Sr. J. C. Olozaga
Presidente & Gerente General
Vicks, Inc.
Apartado V
Cayey, Puerto Rico 00633

Asunto: C-AG-74-0033 ✓
Vicks Merell
Cayey, P. R.

Estimado señor Olozaga:

Hacemos referencia a su solicitud de autorización para operar el sistema de control de contaminación de las aguas para el proyecto arriba citado.

El día 31 de agosto de 1977, personal técnico del Negociado de Calidad de Agua realizó una inspección al mencionado sistema, encontrando una serie de deficiencias. Entre las deficiencias sobresale la descarga continua del efluente del sistema a una quebrada adyacente, la cual es tributaria del Río La Plata, sin haberse expedido un permiso federal de descarga NPDES. El efluente llega a la referida quebrada a través del alcantarillado pluvial.

Originalmente, la JCA autorizó la disposición del efluente del aludido sistema a un campo de percolación. Subsiguientemente, Vicks instaló un filtro terciario y solicitó autorización a la JCA para disponer, durante el tiempo de lluvia exclusivamente, aquella parte del efluente que no pudiera percolarse, en la aludida quebrada a través del sistema de alcantarillado pluvial. Dicha autorización fue concedida por la JCA.

Estamos procediendo a notificar a la Agencia Federal para la Protección del Ambiente (EPA) de esta violación. Le concedemos quince (15) días para que nos indique por escrito la razón por la cual se incurrió en esta violación y para que someta una solicitud de permiso federal de descarga NPDES. La solicitud original deberá enviarse a las oficinas regionales de la EPA en Nueva York y copia

de dicha solicitud deberá someterse a la JCA. De no satisfacerse estos requerimientos dentro del plazo de tiempo condecorado, la JCA procederá a tomar acción legal, ya sea independientemente de EPA en virtud de la Ley 9 del 18 de junio de 1970 o conjuntamente con la EPA al amparo de la Ley Pública 92-500 ("Federal Water Pollution Control Act Amendment of 1972").

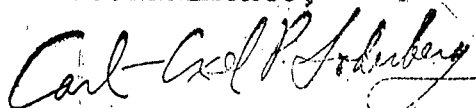
Deseamos indicar que también encontramos las siguientes deficiencias adicionales:

1. Un motor de los compresores estaba averiado.
2. El efluente contiene sólidos flotantes visibles.

Estas deficiencias también deberán corregirse dentro de los quince (15) días a partir de la fecha de recibo de esta carta.

Se le apercibe que esta Junta está facultada para tomar acción legal, así como de imponer sanciones y multas administrativas hasta \$25,000 y en caso de contumacia hasta \$50,000 por incumplimiento de cualquier restricción, reglamento y orden de la Junta bajo las disposiciones de la Ley de Política Pública Ambiental.

Cordialmente,



Carl-Axel P. Soderberg
Director Interino
Negociado Calidad de Agua

*Follow up
Nov. 28/77 - B.K.*

REFERENCE 35

**OFF SITE RECONNAISSANCE
INFORMATION REPORTING FORM**

Date: October 30, 1990

Site Name: Olay Company, Inc. (Former Vicks, Inc.)

Site Address: Road #735 km. 2.3
Rincón Ward
Cayey, Puerto Rico 00633

EQB Personnel:	Name	Discipline
	Johanna Padró	Geologist
	Yamira Rivera	Chemical Engineer

Weather Conditions (clear, cloudy, rain, snow, etc.):

Cloudy, showers.

Estimated wind direction and wind speed:

North-east

Estimated temperature: 76°F

Signature: Johanna Padró

Date: October 31, 1990

OFF SITE RECONNAISSANCE

INFORMATION REPORTING FORM

Date: October 30, 1990

Site Name: Olay Company, Inc.

* * *

9:50 a.m. Arrival to the Olay Company Inc. site. At 10:00 am, EQB personnel met Eng. Lourdes Rodríguez, Project Engineer, in her Office, once there Ms. Rodríguez was interview in relation to various aspects of the company activities.

When asked about the legal owners of the facility actual and past ones, she wasn't able to gave any answers, neither information on when the WWTP began to operate, about potential olds discharges to a local unnamed creek, on previous spills at the facility, and if any other waste storage area was used before the actual one. Mr. Rodríguez informed that the information was going to be send to EQB by mail.

The actual waste storage area, known as the Flammable Storage Cage was estimately builded it for 8 years ago. Actually, all the wastes and/or raw materials storage on the cage are filters used to clean waste waters from the Sinex production. This filters are storage as a hazardous wastes because of low mercury levels in the waters. Since the charcoal filters are used for long periods of time, Mr. Rodríguez couldn't gave us evidence of the last shipment for disposal, nor where previous wastes were dispose.

Other wastes stored on the cage are residues from the laboratory. This wastes are produce in small quantities; usually no more than three, 15 gallons drums of wastes are generated during one year. The wastes are stored in a satellite storage area until the original container is full, than is move to the main storage area (the cage). Actually, Safety Kleen from Manatí, Puerto Rico, recover the company wastes for disposal. All non-hazardous wastes are dispose

by BFI Co. in Ponce, PR.

The Olay facility also operates a WWTP since 1974. The pre-treatment unit eliminates greases from the beauty creams processes, then discharge the waters to the main WWTP. This WWTP also receive the Sinex waste waters, pre-treated by the charcoal filters. All the effluent from the Olay WWTP is discharge to the PRASA "El Torito" WWTP in Cayey.

Once finish the interview, Ms. Rodríguez show us the facility. The first area visited was the Flammable Storage Cage. The cage was a 20' x 40' area covered with a concrete floor (non-diked), surrounded by a fence and protected with an aluminum roof. The area was lock for safety and for fire emergencies, an alarm, sprinklers, and fire extinguishers were available.

One five gallon plastic drum containing toluene, chloroform and piridine wastes from the laboratory was present. Another 55 gallon plastic drum containing ink was observed. Raw material was also stored on the cage. Twenty-two steel drums containing the following substances were observed:

- | | |
|-------------------|------------------|
| . naphtha | . methanol |
| . detergent | . isopropanol |
| . glycol ether | . methyl alcohol |
| . trichloroethane | |

Also six drums containing non-hazardous used charcoal filters were present on the site. Next to this area, but separate by a wall, was the paint storage room, also equipped with alarm and fire extinguishers.

Inside the main building other storage units for raw material are present, but next to each working area. Outside there are various above-ground tanks for caustic soda, petrolatum, turpentine and water. The WWTP was observed to be in good conditions. After take some pictures, EQB personnel leave the site at 11:47 am.

**OFF SITE RECONNAISSANCE
INFORMATION REPORTING FORM**

Date: October 30, 1990

Site Name: Olay Company, Inc.

Camera: Canon T-50

Film: Kodak Color 100

Photographer: Yamira L. Rivera

P H O T O L O G

FRAME/PHOTO NUMBER	DESCRIPTION
1	Flammable Storage Cage and near site houses
2	FSC and OCI building
3	Kerosene tank facing the west side of the plant
4	Kerosene tanks at the north-west corner of the plant



PHOTO 1



PHOTO 2



PHOTO 3



PHOTO 4

PRE-SCORE RESULTS

C:\PRESCORE\OLAYCO
PRO Summary Score

Ground Water

*Observed Release =	0
*Depth to Aquifer =	3
*Precipitation =	2
*Permeability =	2
*Physical State =	0
Total Route Score =	10
*Container =	1
*Toxicity and Persistence =	18
*Hazardous Waste Quantity =	1
Total Waste Score =	19
*Ground Water Use =	6
*Distance to Well/Population =	35
Total Targets =	41
Total Score =	7790.00
 Total Ground Water Score =	 13.59

Press any key to continue.

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PRO Summary Score, (cont.)

Surface Water

*Observed Release =	0
*Site and intervening slope =	0
*Precipitation =	3
*Distance to Surface Water =	2
*Physical State =	0
Total Route Score =	7
*Containers =	1
*Toxicity/Persistence =	18
*Toxic Waste Quantity =	1
Total Waste Score =	19
*Surface Water use =	9
*Dist. to Sensitive Environment =	0
*Distance/Population =	35
Total Targets =	44
Total Score =	5852.00
 Surface Water Route Score =	 9.09

Press any key to continue.

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PRO Summary Score, (cont.)

Air Route

*Observed Release =	0
*Reactivity/Incompatability =	1
*Toxicity =	9
*Hazardous Waste Quantity =	1
*Distance/Population =	30
*Distance to Sensitive Environment =	0
*Land Use =	3
Total Waste Score =	11
Total Targe Score =	33
Total Score =	0.00

Total Air Score = 0.00

Total PRO score = 9.45

Press any key to continue.

Preliminary Assessment Review Form

Site Name: OLAY COMPANY, INC.

Aliases: _____

Address: ROAD 753 KM 2.3 TRINCON WARD

City: CAVEY

County: CAVEY

State: P.R. 987371572

Priority Rating Given: NFRAP
(By State or Contractor)

Agree: X Disagree: _____

If disagree, why? _____

Other Comments: Potential to direct contact is low
- NO EVIDENCE FOR G.W. CONTAMINATION
OR SURFACE WATER CONTAMINATION

Recommendation: NFRAP
Final (By EPA)

Reviewer: Rog. J. Martinez
Date: 2/1/91